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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Mr. William F. Caton
Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, DC 20554

Re: Ex Parte Presentation in CC Docket 95-116, RM 8535
Telephone Number Portability

Dear Secretary Caton:

On Monday, February 26, 1996, representatives of Time Warner Communications Holdings, Inc. ("TWComm") and the Association for Local Telecommunications Services ("ALTS") met with Jason Karp, Attorney Advisor, Geannie Su, Attorney Advisor, and Susan McMaster, Industry Economist of the Common Carrier Bureau. Representing TWComm were Don Shepheard, Sue Blumenfeld, and Thomas Jones. Representing ALTS was Heather Gold. Attached are two copies of the outline which describes the substance of the presentation and which was submitted at today's meeting.

Please let me know if you have any questions.

Sincerely,

Thomas Jones

Enclosure

cc: Matthew Harthun
Jason Karp
Geannie Su
Susan McMaster

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TIME WARNER COMMUNICATIONS
EX PARTE PRESENTATION RE/NUMBER PORTABILITY

Regulatory Issues
(CC Docket No. 95-116)

- The FCC must find that true, database service provider number portability is technically feasible today and, in the very near future, will be commercially practicable as well.

- The FCC has the authority under the 1996 Telecom Act to order the implementation of true, database service provider number portability now and should adopt rules for service provider portability implementation in its upcoming Order in CC Docket No. 95-116. The FCC should adopt the following implementation scheme:

  - Prescribe the following functional criteria which all database service provider portability solutions must satisfy:

    -- True number portability - Ported subscribers must be able to keep their original telephone numbers.

    -- Compatible with database solutions - solutions should have transparent interfaces with database solutions.

    -- Triggering - Either an IN or AIN trigger must be used to access the database. In cases where a LEC has neither IN nor AIN, the Commission should require the deployment of IN triggers.

    -- Full feature interactions - All switch-based functions, including CLASS functions, should function properly.

    -- Efficient allocation of access revenues - The CLEC should be able to charge IXCs for access to its facilities.

    -- Ten digit routing - A ten digit routing code should be used to route calls from the LEC to the CLEC.

- Require Implementation of N-1 Call Processing Scenario.

- Delegate to each state the authority to implement number portability solutions in compliance with the criteria listed above and with the following:

- By no later than **March 31, 1997**, each state shall publish a Portability Implementation Order. Each Order shall include:

  -- a description of the service provider technology chosen

  -- a list of the companies involved in the development and provision of the service (vendors, LECs, CLECs, IXCs etc.)

  -- the locations (by central office or region) in which the state has decided to order initial deployment

  -- a schedule for deployment which includes dates certain for establishment of operator services, switching, SCP, operations, and selection of SMS vendor. Initial deployment shall commence no later than **December 31, 1997**.

- In addition to any initial implementation schedule, each local exchange carrier shall have the obligation to provide true, database service provider number portability 6 months after bona fide request.

- State proceedings should build on the Illinois number portability implementation process. With Illinois as a model, there is no reason why states cannot comply with the deadlines listed above.