

1. Resell Requirements

From Bellcore's meeting, it is my understanding that Bellcore is not developing LNP requirements to support resell aspects of local service, i.e., Bellcore is assuming that a number can not be ported within a switch. MCI considers resell an integral part of local competition. Thus, Bellcore should include resell requirements in the first phase of the Feature Specification Document (FSD) on LNP. One example of the resell requirement is the inclusion of the identification of the local service provider in the AMA record (issue #43). Bellcore should emphasize the need for the resell requirements to its client companies, and share with MCI any such requirements identified to date.

2. ICC Requirements

MCI strongly supports the LNP requirements being developed by the industry in the Illinois Commerce Commission (ICC) activity, and sees no reason for Bellcore to deviate from them. Some of the examples where Bellcore is not compatible with the ICC requirements are: 1) the use of the JIP parameter at the end office and tandem for the access billing; 2) setting of GAP and FCI by the SCP (issue #35); 3) use of the "LSPP-only" AMA module which does not support location and service provider ID; and 4) the Last Resort AMA record generation.

3. Portability Across Rate Center and Location Portability

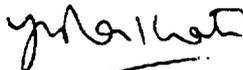
It is premature for Bellcore to develop requirements for rate center and location portability ahead of the rest of the industry. The immediate need within the industry is to define requirements for the service provider portability. A number of issues are involved with the rate center and location portability which have not been discussed and agreed within the industry. Some of these issues are: carrier selection, signaling between switches, location of LNP query for OS calls, impact on AMA recording, use of toll warning tone, support of payphone coin collection, hotel/motel calls etc. MCI also completely disagrees with Bellcore's plan to develop requirements for rate center and location portability based on the QoR approach.

4. Miscellaneous Issues

MCI also supports modifying overall objective to minimize impact on all users (issue #18), the need for 3-10 digit AIN trigger (issue #31), investigating signaling/procedures to support Busy Line Verification (BLV) between networks (issue #14), and new translation type to support TCAP message routing for call setup and/or message relay (issue #4).

In conclusion, MCI strongly believes that unless the requirements reflect the view of the entire industry, including CLECs and InterExchange Carriers (IXCs), Bellcore will be undermining the industry efforts to develop LNP. I ask that you will give your utmost consideration to the issues raised by MCI in this letter. I look forward to the first release of the Bellcore FSD incorporating resolution of these issues.

Sincerely,



Yatendra K. Pathak
Technical Standards Management

Cc: LNP Industry Interaction Meeting Attendees

CERTIFICATE OF SERVICE

I, **Stan Miller** do hereby certify that copies of the foregoing Comments were sent via first class mail, postage paid, to the following on this 20th day of May, 1996.

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