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May 16, 1996

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

DOCKET FILE COPY ORIGINAL

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

Dear Secretary Caton:

On Wednesday May 15, 1996, representatives of Time Warner Communications ("TWComm") met with Jim Casserly, Senior Legal Advisor to Commissioner Susan Ness. Representing TWComm were Don Shephard, Phil Verveer and Thomas Jones. Attached are two copies of two outlines which describe the substance of TWComm's presentation and which were submitted at today's meeting.

Please let me know if you have any questions.

Sincerely,

  
Thomas Jones

cc: Jim Casserly

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

**TIME WARNER COMMUNICATIONS  
EX PARTE PRESENTATION RE/NUMBER PORTABILITY  
(CC Docket 95-116)**

- The FCC has jurisdiction over all aspects of number portability including cost recovery.
- The FCC is obligated to order the implementation of true service provider portability.
  - Section 3(30) defines number portability to mean true service provider portability.
  - Section 251(b)(2) states that all LECs have "[t]he duty to provide, to the extent technically feasible, number portability in accordance with requirements prescribed by the Commission."
  - Section 251(b)(2) only permits the FCC to consider the technical feasibility of true service provider portability; Congress conspicuously omitted any reference to cost from Section 251(b)(2).
  - As demonstrated by number portability proceedings in Illinois, Georgia and Maryland, true service provider portability is technically feasible.

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# TIME WARNER COMMUNICATIONS

## NUMBER PORTABILITY (CC Docket No. 95-116)

- *Database Number Portability is a critical element for local service competition*
  - INP costs over \$5 per ported residence number (\$10/business) based on rates for RCF and lost access revenue
- Insure rapid implementation of service provider portability
  - Is technically feasible today: N-1, LRN database solution
- Prescribe the functional criteria which all database service provider portability solutions must satisfy.
  - Ported subscribers may keep their original telephone number
  - Compatible, transparent interfaces
  - Either IN or AIN trigger
  - Full switched based feature interactions (including CLASS functions)
  - Access revenues collected by carrying LEC (ILEC/CLEC)
  - Ten digit routing code
- Delegate to each state the authority to implement number portability solutions in compliance with the criteria listed above and that by no later than **March 31, 1997**, each state shall publish a Portability Implementation Order to include:
  - A description of the service provider technology chosen
  - A list of the companies involved in the development and provision of the service (vendors, ILECs, CLECs, IXC's etc.)
  - The locations (by central office or region) in which the state has decided to order initial deployment
  - A deployment schedule that 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**.
- Assign each local exchange carrier the obligation to provide true, database service provider number portability within 6 months after bona fide request
- State proceedings should build on the Illinois and Georgia number portability implementation process. ***With these models in place, there is no reason why states cannot comply with these deadlines.***

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