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Lucent Technologies
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Ex Parte

May 20, 1996

Ms. Jennie Su
Common Carrier Bureau
Policy and Program Planning Division
Federal Communications Commission
1919 M Street, N.W., Room 534-D
Washington, D.C. 20554

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**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY**

Dear Ms. Su,

Re: Telephone Number Portability, CC Docket No. 95-116

This letter is in response to your request to Karen Weis regarding Location Routing Number (LRN) software availability and our deployment capabilities for Lucent Technologies' switching systems. Lucent Technologies welcomes the opportunity to provide information to support the FCC and the industry in the implementation of Number Portability.

The LRN capability being provided is based on the LRN requirements which were developed on a multi-company basis in conjunction with the Illinois Commerce Commission¹. The planned availability for Lucent Technologies' switching systems is as follows:

- LRN 5ESS®-2000 Switch General Availability planned for 3/31/97 on the 5E11 Release
- LRN 1A ESS™ Switch General Availability planned for 3/21/97 on the 1AE13 Release
- LRN 4ESS™ Switch General Availability planned for 5/1/97 on the 4E22R2 Release

¹ "Illinois Number Portability Workshop - Generic Switching and Signaling Requirements for Number Portability," Issue 1.01, April 3, 1996.

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The overall telecommunications software implementation process is determined by the telecommunication service providers. One element of the implementation process for which they are dependent on equipment manufacturers is software delivery. Our capacity to deliver the LRN software to the service providers is a function of our software release update process. That update process can support up to 50 software release updates per week for the 5ESS Switch and 50 per week for the 1A ESS Switch for the North American region. Each release update upgrades the software for a single 5ESS or 1A ESS Switch. Installation of the 5E11 Software Release for the 5ESS-2000 Switch can begin in 4Q96.

The LRN General Availability date is defined as the date in which the LRN-specific software can be activated by the service provider. LRN deployment schedules after General Availability are determined by the service provider, provided that the base software release that will support the LRN capability has already been installed.

An additional issue which could affect the deployment of LRN that the FCC can influence is the industry's testing approach. Lucent Technologies recommends a single national level multi-company network test for LRN. It would be cost-effective and technically beneficial to conduct a national inter-company verification test through the Inter-network Interoperability Test Plan Committee (IITPC), which is championed by the Network Operation Forum (NOF).² This effort could provide an industry focal point that could accomplish both inter-company and inter-vendor testing. This approach would be consistent with and support the recommendation of the Signaling Network Systems Subcommittee of the Network Reliability Council (NRC) in the "Network Reliability: A Report to the Nation" in June of 1993.^{3 4}

If you have any questions please don't hesitate to call me. If you have any questions please call me at 202-457-7435.

Sincerely,



Carol Wilner
 Director - Federal Public Affairs
 Lucent Technologies
 1120 20th St., N.W., Suite 1000
 Washington, DC 20036

² Network Operation Forum is a national committee under the auspices of the Alliance for Telecommunications Industry Solutions (ATIS)

³ "Network Reliability: A Report to the Nation," June 1993. Section B: Signaling Network Systems Committee Technical Paper. Paragraph 8.3, pages 45-46.

⁴ "NRC Task Group II Report on Increased Interconnection," Section 7 pages 66-68, March 1, 1996.