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May 23, 1996

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**FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY**

William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, NW  
Mail Stop Code 1170  
Washington, D.C. 20544

RE: Ex Parte Presentation  
CC Docket No. 95-116 -- Telephone Number Portability

Dear Mr. Caton:

Pursuant to the requirements of Sections 1.1200 et seq. of the Commission's Rules, this is to notify you that on behalf of AT&T Wireless Services, Inc., Charlene Meins and I met yesterday with Karen Brinkmann and David Wye of the Wireless Telecommunications Bureau and Jason R. Karp, Carol E. Matthey and Susan McMaster of the Common Carrier Bureau. We used the attached materials to discuss CMRS number portability issues.

Should there be any questions regarding this matter, please contact the undersigned.

Sincerely,

*Cathleen A. Massey*  
Cathleen A. Massey

cc: Meeting Participants

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# CMRS NUMBER PORTABILITY ISSUES

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Presented by

AT&T WIRELESS SERVICES, INC.

Cathy Massey

Charlene Meins

May 22, 1996

Washington, D.C.

AT&T Wireless Services, Inc.



# CMRS NUMBER PORTABILITY ISSUES

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## Impacts on Wireless Mobile Station Registration

- Current use of mobile identification number NPA-NXX for IS-41 based registration and validation procedures to identify subscriber service provider.

# CMRS NUMBER PORTABILITY ISSUES

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## Impacts on Wireless Mobile Station Call Delivery

- Possible additional procedures needed in order to minimize the number of subsequent database dips involving a call from the home Mobile Switching Center (MSC) to the serving MSC.
- MSCs which serve multiple geographic regions may have to accommodate all of the number portability solutions which have been deployed in the operating regions served by the home wireless system with which the serving MSC has a roaming agreement.

# CMRS NUMBER PORTABILITY ISSUES

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## Impacts on Wireless Switches for Call Origination

- IN or AIN trigger capability specified by proposed solutions not supported in current IS-41 standard.
- TR 45 Standards pursuing Wireless Intelligent Network (WIN) call models - availability and compatibility unknown at this time.
- Potential need for MSC support of multiple wireline solutions within its serving area.
- Potential requirement for MSCs to implement SS7 ISUP.

# CMRS NUMBER PORTABILITY ISSUES

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## Impacts on Wireless Fraud Management

- Current procedures utilize analysis of DMH IS-124 records NPA-NXX of subscriber to identify the subscriber's service provider.
- Will have to move to 10 digit analysis or implement alternative subscriber identifier.
- Other potential fraud impacts are unclear.

# CMRS NUMBER PORTABILITY ISSUES

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## Impacts on Interconnection Arrangements

- Wireless service providers will be impacted by the implementation of number portability, even if number portability is limited to the local exchange carrier networks.
- Existing interconnection arrangements could be adversely affected.

# CMRS NUMBER PORTABILITY ISSUES

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## Impacts on Support Systems

- Will need to develop local support system capabilities to manage ported numbers and develop interface to state, regional or national Service Management System.
- Current SMS development and implementation must allow for integration of other carrier participants, such as CMRS, as the future may determine.

# CMRS NUMBER PORTABILITY ISSUES

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## Impacts on Wireless Roaming Arrangements

- Implementation of number portability in even a few wireless networks impacts other wireless providers because of roaming agreements.
- Non-participating wireless provider must still be able to determine home service provider of ported wireless roamer.

# CMRS NUMBER PORTABILITY ISSUES

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## Impacts of Interim Solutions

- Limitations of RCF in areas of call origination by the ported wireless subscriber and wireless registration.
- RCF in wireless suffers some of the same drawbacks as in wireline.

# CMRS NUMBER PORTABILITY ISSUES

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## Summary and Conclusions

- A uniform national solution is required for call handling.
- A wireless mobility environment raises additional technical issues which must be addressed to ensure subscriber identification for registration and validation.
- Number portability in a wireless mobility environment necessitates a different implementation timeline for CMRS providers than for wireline providers.