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James K. Smith
Director
Federal Relations

September 30, 1996

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SEP 30 1996

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, NW
Room 222
Washington, DC 20554

RE: **Ex Parte Statement**
Docket 95-116

Dear Mr. Caton:

On September 23, 1996, Mr. Terry Appenzeller, Vice President - Open Market Strategy and I met with Ms. Mary DeLuca and Ms. Marian Gordon of the Network Services Division and Mr. Jason Karp of the Policy and Program Planning Division to discuss matters that may come before the North American Numbering Council. The attached material was used as part of our discussion.

Sincerely,

Attachment
cc: M. DeLuca (w/o attachment
M. Gordon (w/o attachment
J. Karp (w/o attachment)
J. Su (w/attachment)

No. of Copies rec'd 0+2
List A B C D E

Number Portability Discussion - Topics

- Status of Illinois Number Portability Workshop and other Ameritech States
- Subjects Raised in Petitions For Reconsideration of Docket 95-116
  - Deployment Plan Schedule Proposal (Answer to BellSouth, GTE, NECA)
  - Feasibility of Implementation/Test Plan (Answer to BellSouth)
  - Regional Databases vs. National Plan (Answer to Pacific Bell, BellSouth, NYNEX)
  - Architecture (Answer to Pacific Bell, BellSouth, GTE, Bell Atlantic, NYNEX)
  - CMRS Implementation (CMRS Association, GTE)

DRAFT

EX PARTE

Ms. Regina Keeney
Chief - Common Carrier Bureau
Federal Communications Commission
1919 M Street, N.W. Room 500
Washington, DC 20554

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

Dear Ms. Keeney:

The undersigned parties - all participants in the Illinois Local Number Portability ("LNP") workshop process - wish to take this opportunity to encourage the Commission to allow some flexibility in the execution of carriers' obligation to deploy long term number portability in the top 100 Metropolitan Statistical Areas (MSAs) by the dates listed in Appendix F of the First Report and Order of CC Docket 95-116. Such flexibility will ensure the deployment of number portability in a manner that both meets the needs of competing carriers and efficiently uses the resources of the incumbent LECs.

As you are aware, the Illinois Workshop has been a leader in selecting a long term solution for number portability, developing the supporting technical specifications, selecting a neutral third party database administrator, and moving forward with actual deployment in Market Service Area 1 (Chicago). As part of that effort and prior to the release of the FCC Order, competing carriers were invited to submit lists to the Illinois Commerce Commission Staff of preferred offices for initial deployment of LNP. These individual carrier lists were subsequently aggregated into one list for the entire area, and used to create a master deployment schedule. Although the area under consideration contains a total of 206 exchanges, requests were received for number portability in only 103 exchanges. The sole criteria in preparing the list of preferred exchanges was the immediate need of the competing carriers. A coincidental result of this exercise was the exclusion from the list of those exchanges serving some of the more rural portions of the market service area, including many served by the smaller, independent telephone companies and some served by older technology switches.

We believe the same methodology should be employed for all exchanges within the MSAs listed in Appendix F of the Order, i.e., allowing all competing carriers within the area of LNP to decide which offices should be converted within the timeframe specified by the Order. Attached, for your consideration, is our proposal for limiting the initial deployment to end

offices where there is an expressed interest for LNP from competing carriers. We believe it represents a reasonable and workable approach to introducing long term number portability in key areas across the nation.

Sincerely,

Terry D. Appenzeller
Vice President - Open Market Strategy
Ameritech

Pamela Kenworthy
Senior Manager - Industry Policy
MFS Intelenet of Illinois, Inc.

R. G. Salemme
Vice President - Federal Government Affairs
AT&T Corporation

Edmond P. Gould
Vice President - Technology
Teleport Communications Group, Inc.

Phillip Felice
Regulatory Manager
Central Telephone Co. of Illinois

Donald Evans
Vice President - Federal Regulatory Affairs
MCI Telecommunications Corp.

Ron Havens
Director - Industry Forums
Sprint Communications Company, LP

Lawrence Little
Manager - Regulatory Policy
GTE

Proposal
(9/4/96)

Relief should be granted to incumbent Local Exchange Carriers (LECs) from the obligation to deploy a long-term number portability feature capability in all end offices within those MSAs identified in Appendix F of the First Report and Order of CC Docket 95-116. Such relief is appropriate if and only if, no competing LEC has requested/identified a particular office to be opened for number portability.

All LECs participating in number portability in a given MSA will jointly develop an end office implementation list. This deployment list will be based upon input received from competing carriers as to which end offices the capability to port numbers is desired. This list may be developed with the assistance or under the direction of the individual state commission. After such input is received, and no later than 6 months plus forty-five (45) days prior to the start date(s) shown in Appendix F, the deployment schedule will be submitted to the Chief, Common Carrier Bureau. No later than six (6) months prior to the start date(s) shown in Appendix F, absent any changes required by the Chief, Common Carrier Bureau, the deployment schedule will become final. The final list will contain all end offices requested by at least one competing carrier at any time prior to the date the deployment list is submitted to the Common Carrier Bureau.

Those end offices located in the MSA but not listed in the final deployment schedule (i.e., those end offices not requested by any competing carrier by the date the schedule becomes final) will be converted, based upon the receipt of a bonafide request, according to the intervals listed below. Such bonafide requests may not be submitted until after the end date(s) listed in Appendix F for the affected MSA.

A request will be considered bona fide if it meets the following criteria:

1) The requesting carrier must forward a written request which lists the exchanges and dates desired; and

2) The requesting carrier is a facilities-based provider and has certification, or has applied for certification, to serve the area being requested.

Deployment Intervals

Remote Off an Equipped Host	LNP-Capable Switch - No Hardware Needed	LNP-Capable Switch - Hardware Needed	Non LNP-Capable Switch Requiring Replacement
30 days*	60 days	No later than six (6) months**	Subject to negotiation, on a case-by-case basis, between affected carriers***

* Assumes host and remote have same technical capabilities

** Examples of such hardware requirements include processor upgrades, SS7 network interfaces, and other switch modules

*** Agreements reached and/or outstanding disputes will be submitted to the CCB for final approval or resolution

Note: Nothing within this document should be construed as a forfeiture of the rights of any party to seek redress of perceived harm or inequity under the provisions of the First Report and Order in CC Docket 95-116.

Number Portability Status - Illinois

San Francisco, CA

September 18, 1996

T. D. Appenzeller
VP - Open Market Strategy
(847) 248-4450

Ameritech

FCC's Number Portability Order (Docket 95-116), Issued July 2, 1996

- 9 Performance Criteria Must Be Met by Call Model Architecture
- 100 Largest Metropolitan Areas Must Be Implemented Between 10/97 - 12/98. Other Areas via Bona Fide Request
- Wireless Carriers and Wireline Networks Involved
- Neutral Third Party Administrator Required
- Chicago To Be National Field Trial - Results Due By 8/31/97
- Cost Recovery Issues To Be Resolved in Separate Proceeding

Summary of Long Term Number Portability Implementation Status - Illinois

- "LRN" (Location Routing Number) Architecture Selected 9/95
- Generic Switch & SCP Requirements - Completed, Basis for Vendor Delivery of Software 11/95
- Neutral Third Party Data Base Administrator Selected 4/96 (Lockheed-Martin)
- Implementation in Chicago Metropolitan Area 4Q 1997 (FCC Order Requirement)
- Field Test for United States Per FCC Order
  - Start 1/97, Completed 7/97
- Cost Recovery Issues Unresolved

Purpose of the ICC Number Portability Workshop

Near Term: Develop, evaluate and recommend a wireline service provider number portability solution and propose an implementation plan.

Phase I

- Chicago LATA (MSA-1)
- Competitively neutral
- Technically and economically feasible
- Meets planning criteria

Long Term: Explore desirability and feasibility of expanding to wireless networks, location portability, service portability, other enhancements.

Phase II

ICC Number Portability Workshop Participants

AG Communications
Ameritech *
Andersen Consulting
AT&T *
Bell Atlantic
Bellcore
BellSouth Cellular
Cellular One *
Cincinnati Bell
Citizens Utility Board
City of Chicago
Consultants for CATV
DSC Communications
Ericsson
GTE *
IBEW
ICC Staff *
Illinois Consolidated Telephone Company
Maryland PSC
MCI Metro *
MFS *
Motorola
Nextel Communications
Northern Telecom
Pacific Bell
Public Utilities Commission of Ohio
Siemens-Stromberg Carlson
Sprint/Centel *
Stratus Computer
Teleport *
Time Warner Communications
US Intelco
and others....

* Evaluators/Selectors for Architecture

What is Number Portability?

- **Service Provider Portability:**
  Primary focus of industry, public policy debate. Ability to change provider without changing telephone number.

- **Location Portability:**
  Ability to change locations without changing telephone number.

- **Service Portability:**
  Ability to change type of service POTS to ISDN, for example without changing telephone number.

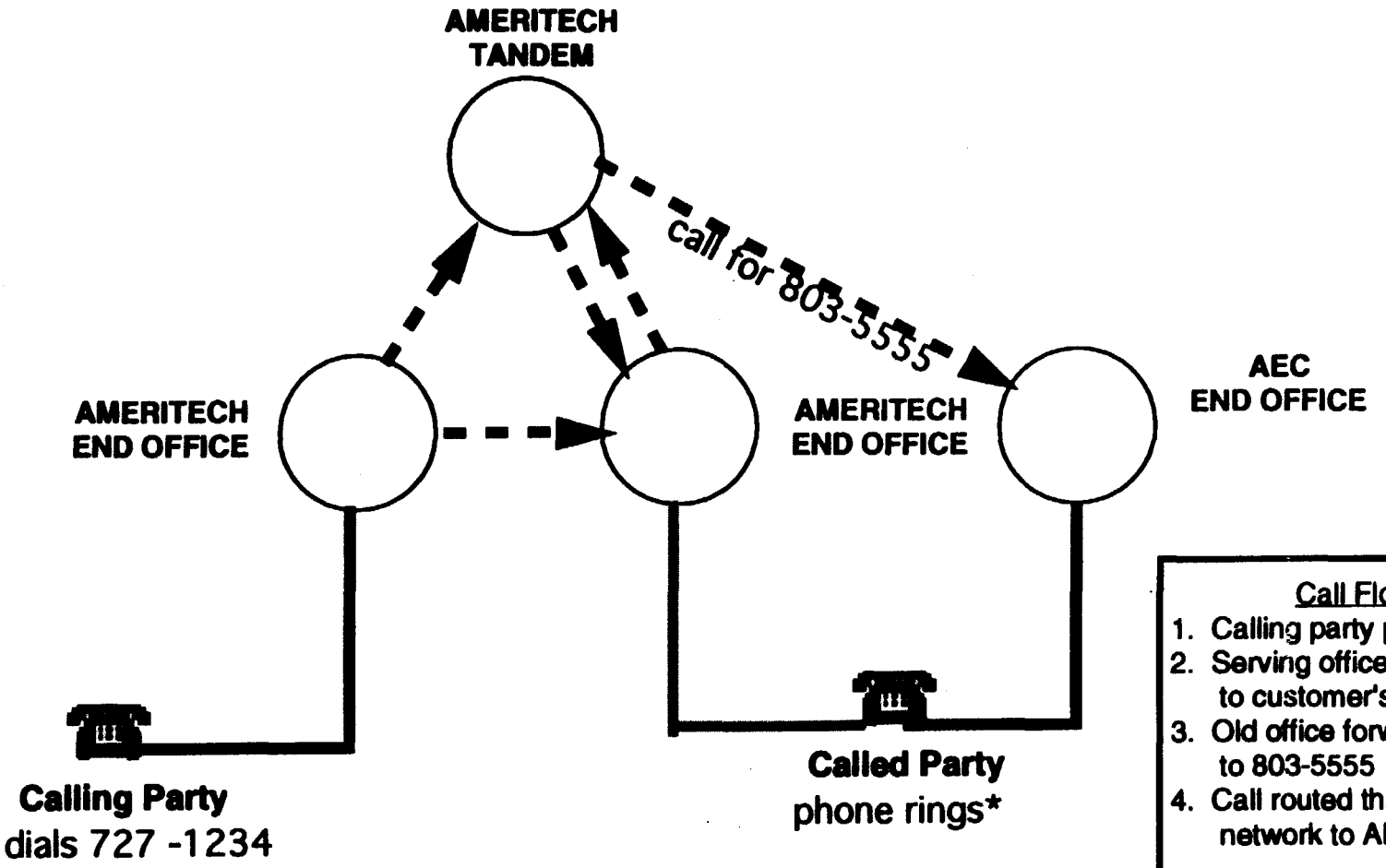
Interim Number Portability

Only Currently Available Methods for Providing Service Provider Portability without Implementing a Database System Are:

- **Service Provider Number Portability - Remote (SPNP - Remote): Similar to Remote Call Forwarding (RCF)**
- **Service Provider Number Portability - Direct (SPNP - Direct): Similar to Direct Inward Dialing (DID)**
- **Both methods have limitations, generally features and functions, performance limitations, must utilize LEC network to perform the functions. Pricing has been an issue.**

SERVICE PROVIDER NUMBER PORTABILITY (SPNP) - REMOTE

AEC REQUESTS THAT CALLS TO THE OLD NUMBER BE FORWARDED TO A NEW AEC NUMBER



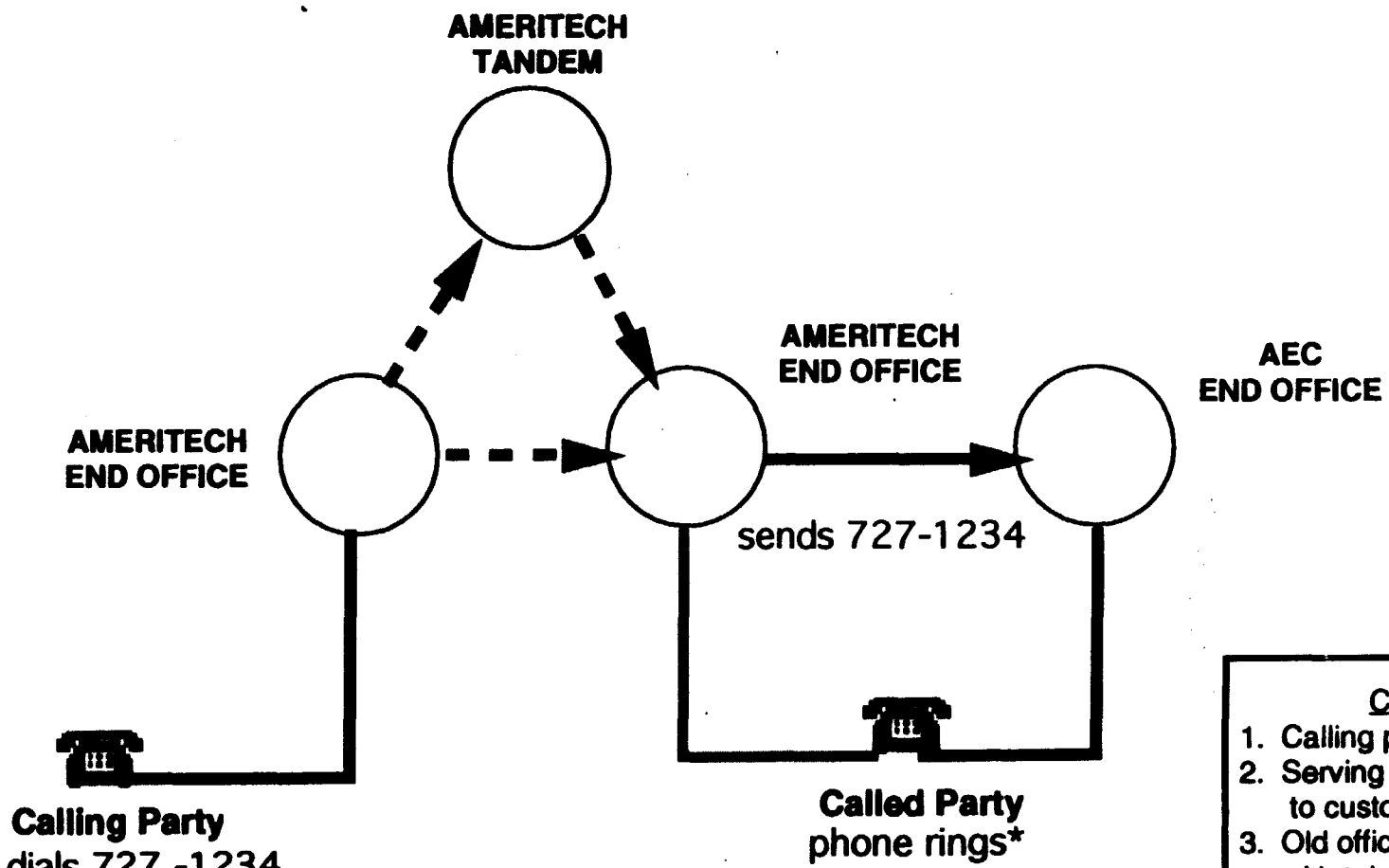
Call Flow

1. Calling party places call
2. Serving office sends call to customer's old office
3. Old office forwards call to 803-5555
4. Call routed through the network to AEC switch

* Depending on AEC network design Customer may or may not be aware of AEC number assigned

SERVICE PROVIDER NUMBER PORTABILITY (SPNP) - DIRECT

AEC REQUESTS THAT CALLS TO THE OLD NUMBER BE SENT DIRECTLY TO AEC



* At the option of the AEC the customer may or may not be assigned a separate AEC number

Call Flow

1. Calling party places call
2. Serving office sends call to customer's old office
3. Old office sends call with telephone number to the AEC office via a direct trunk group

Selection Criteria - Long Term Number Portability

Mandatory Attributes:

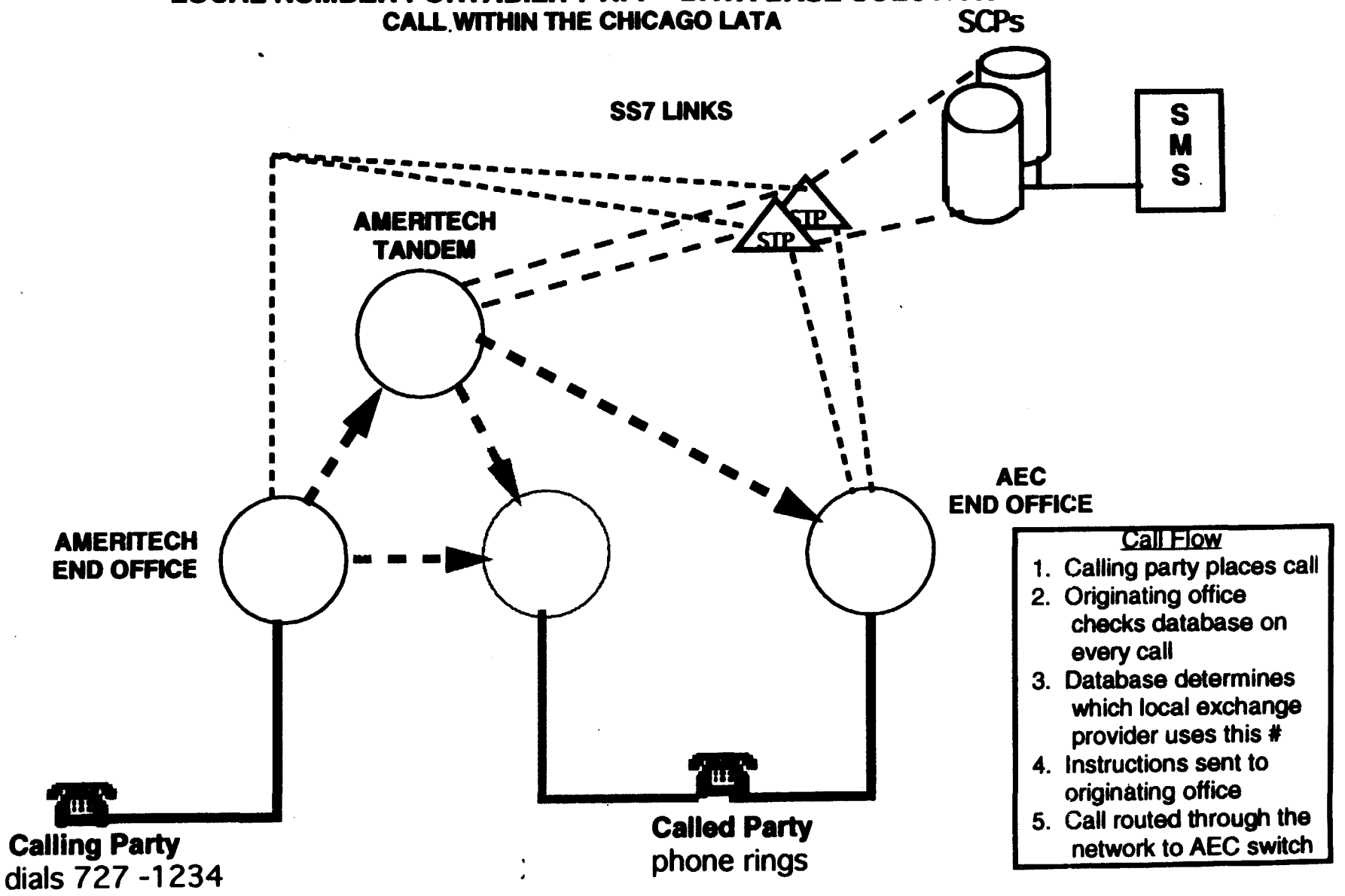
- **Available To All Wireline Customers Within Selected Area**
- **No Number Change Required**
- **Database Dip Possible From Originating, Intermediate or Terminating Switch**
- **Incumbent LEC (Donor Switch) Not Essential For Completing Calls**
- **Interface with Non-LNP Capable Networks**
- **Database Response Provides Sufficient Information for Unambiguous Routing To Terminating Switch**

Selection Criteria (continued)

Mandatory Attributes (continued):

- **Minimum Increase In Call Setup Delay**
- **Existing Features Should Be Unaffected**
- **Operator Assisted and Coin Calls Must Work Properly**
- **Ported Calling Card Numbers Must Be Validated**
- **911 Calls Must Function Properly**
- **Calls To Ported Numbers Must Be Rated Properly**
- **Solution Must Be Migratable To Location and Service Portability**
- **Solution Should Conserve Numbering Resources**

LOCAL NUMBER PORTABILITY RFP - DATA BASE SOLUTION
CALL WITHIN THE CHICAGO LATA

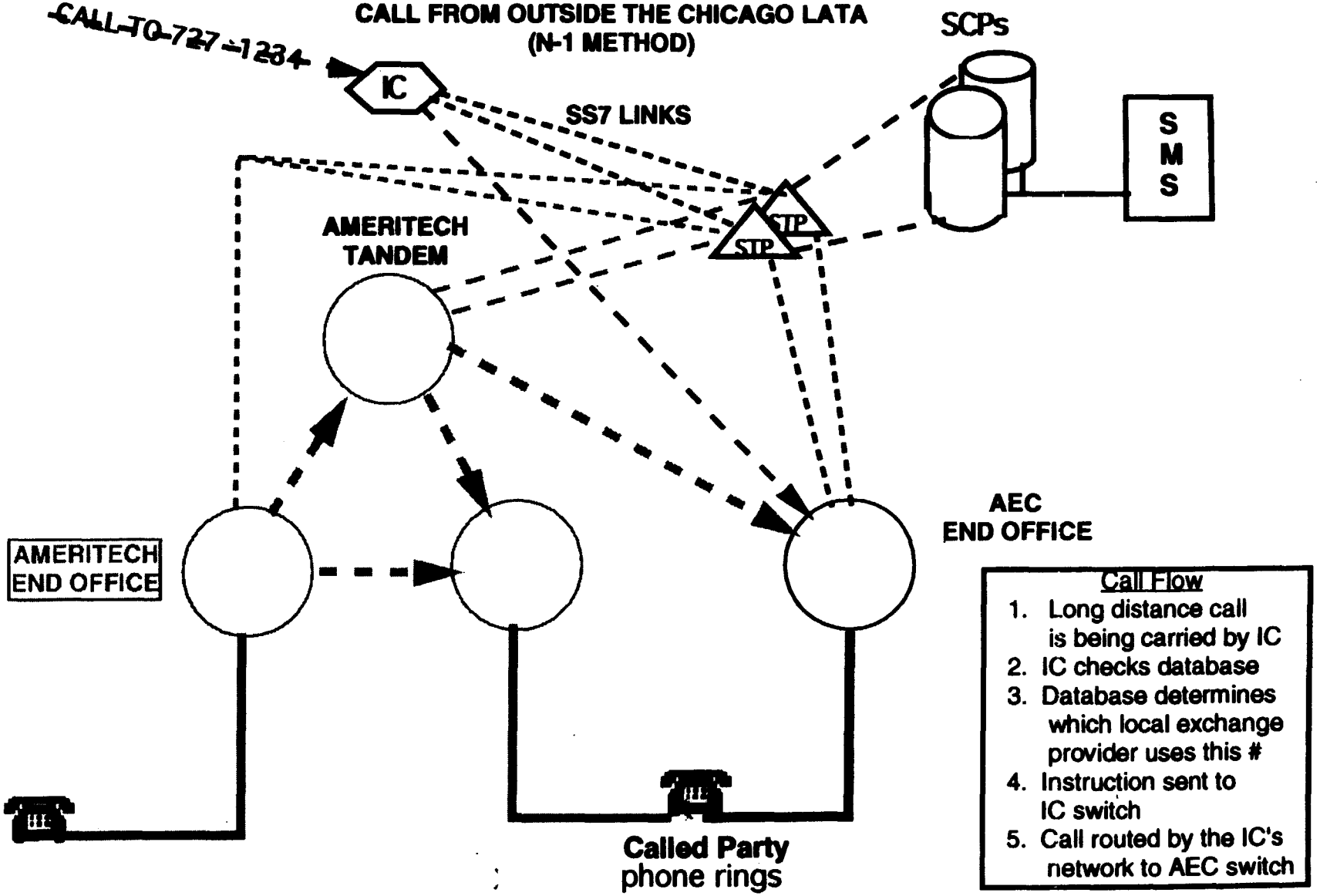


Call Flow

1. Calling party places call
2. Originating office checks database on every call
3. Database determines which local exchange provider uses this #
4. Instructions sent to originating office
5. Call routed through the network to AEC switch

LOCAL NUMBER PORTABILITY RFP - DATA BASE SOLUTION

CALL FROM OUTSIDE THE CHICAGO LATA (N-1 METHOD)

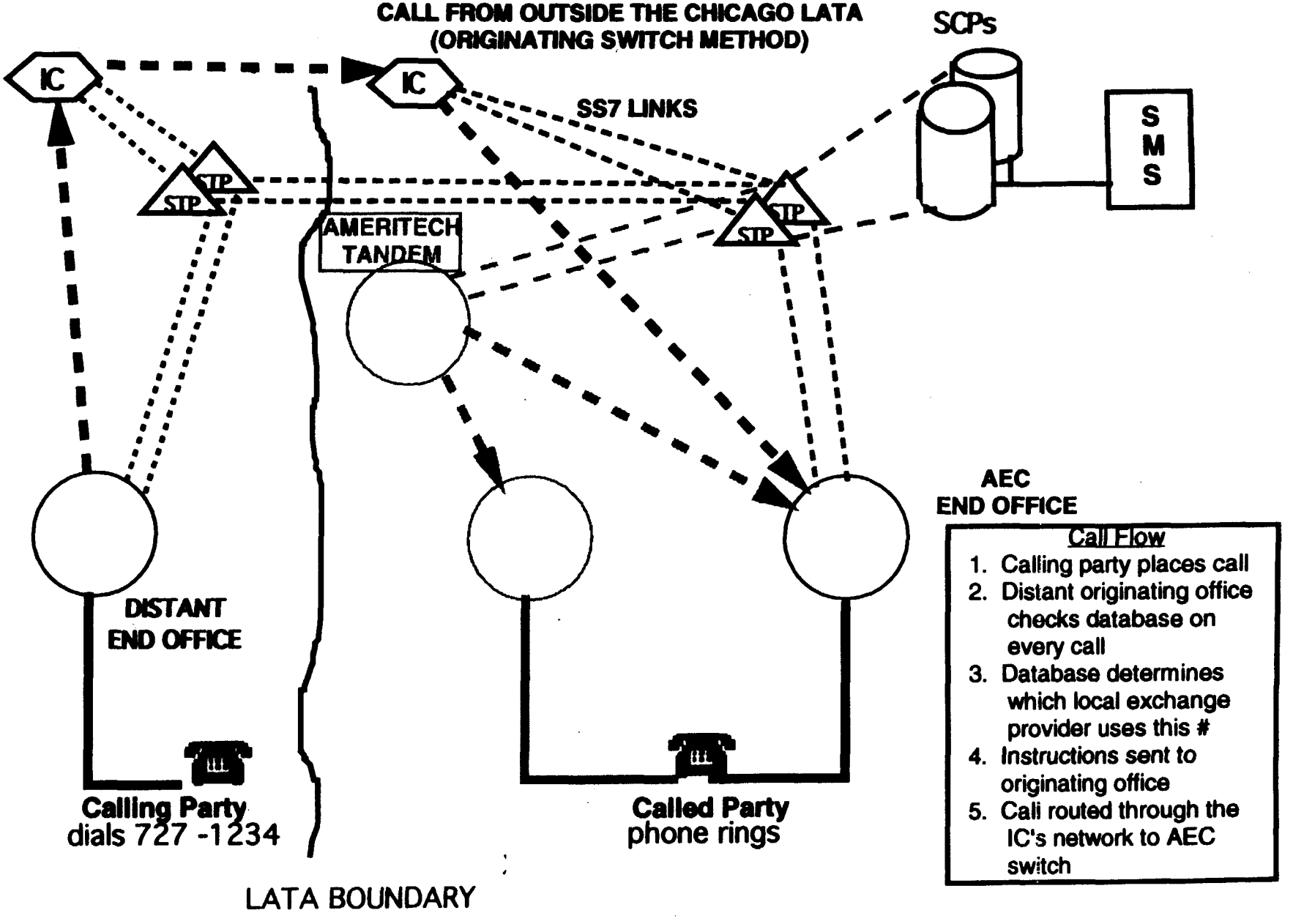


Call Flow

1. Long distance call is being carried by IC
2. IC checks database
3. Database determines which local exchange provider uses this #
4. Instruction sent to IC switch
5. Call routed by the IC's network to AEC switch

LOCAL NUMBER PORTABILITY RFP - DATA BASE SOLUTION

CALL FROM OUTSIDE THE CHICAGO LATA (ORIGINATING SWITCH METHOD)

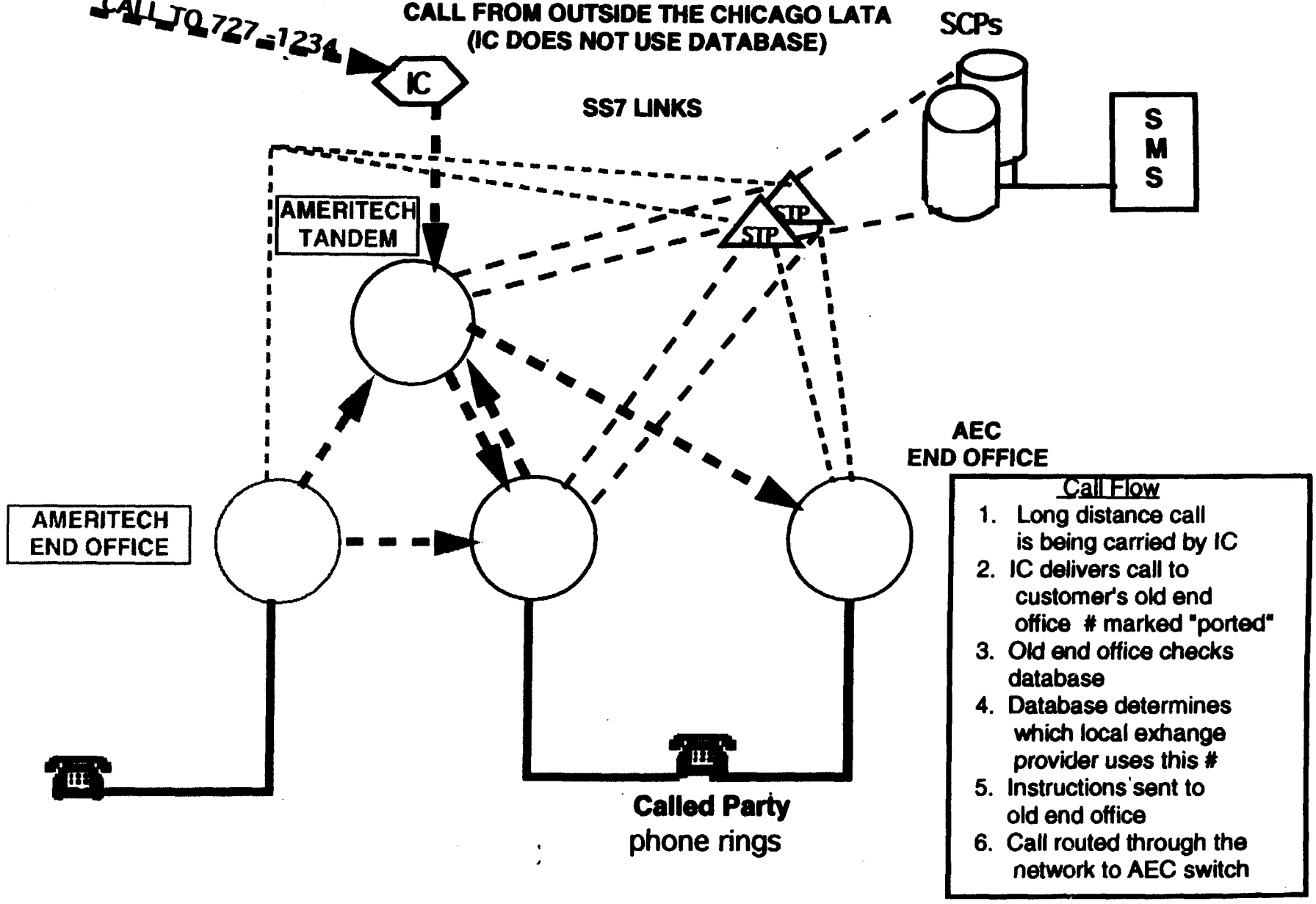


Call Flow

1. Calling party places call
2. Distant originating office checks database on every call
3. Database determines which local exchange provider uses this #
4. Instructions sent to originating office
5. Call routed through the IC's network to AEC switch

LOCAL NUMBER PORTABILITY RFP - DATA BASE SOLUTION

CALL FROM OUTSIDE THE CHICAGO LATA
(IC DOES NOT USE DATABASE)



Call Flow

1. Long distance call is being carried by IC
2. IC delivers call to customer's old end office # marked "ported"
3. Old end office checks database
4. Database determines which local exhange provider uses this #
5. Instructions sent to old end office
6. Call routed through the network to AEC switch

Illinois Number Portability Workshop Chronology of Accomplishments

• Workshop Formed (ICC Order Requirement)	4/95
• Implementation Plan (Scope) Developed	7/95
• Established/Documented Planning Principles and Criteria for Selecting a Call Model Architecture ("LNP Framework")*	7/95
• Selection of LRN As Call Model Architecture *	9/95
• Obtained Switch Vendor Commitments To Deliver LRN Software by 2Q 97* Established Phase I Implementation Timeframe of 3Q 97*	10/95
• Developed Detailed Switching and Signaling Generic Requirements for LRN *	11/95
• Developed Number Portability Administration Center/Service Management System ("NPAC/SMS") Requirements and Issued RFP for Administrator *	2/96
• Stipulation and Agreement Reached Among Participants (LRN Deployment Plan) *	2/96
• Selection of Neutral Third Party Administrator for NPAC/SMS (Lockheed-Martin) *	4/96
• Joint Letter to FCC Recommending LRN As National Architecture *	5/96
• Joint Letter to FCC Recommending National Structure and Process for SMS *	6/96
• Limited Liability Corporation (LLC) Formed for NPAC/SMS Contract *	8/96
• Joint letter to FCC Recommending Deployment Plan Office Selection Process *	9/96

* First in the Nation

Illinois Number Portability Workshop Structure and Future Plans

- **Eight Established Subcommittees Working on Implementation Issues:**
  - NPAC/SMS
  - Billing & Rating
  - Operator Services
  - Switch Generic Requirements
  - SCP Generic Requirements
  - Operations
  - Cost Recovery
  - Coordinating Committee

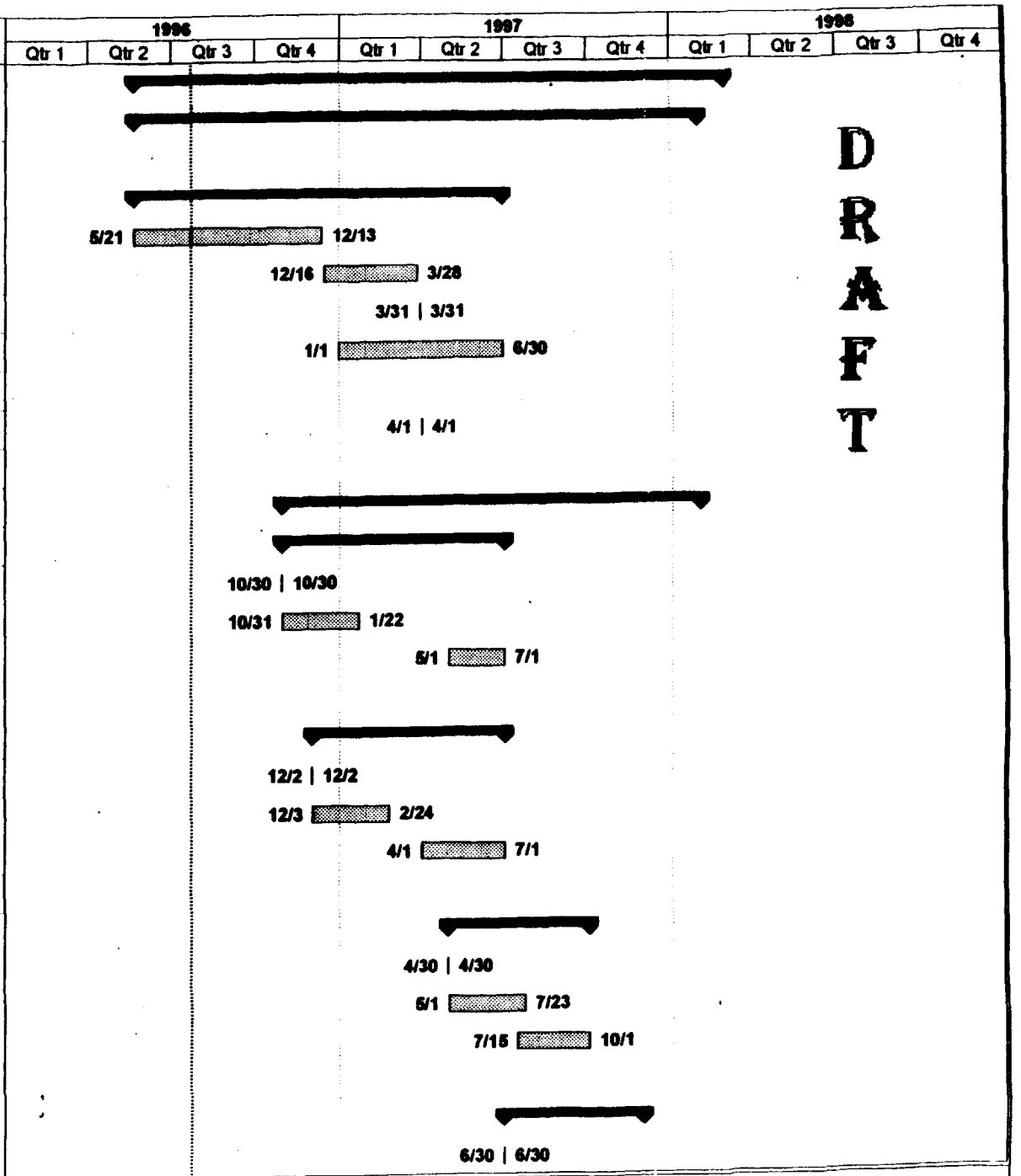
- **Significant 1997 Plans:**
  - Operation and Testing of NPAC/SMS
  - Specific Office Conversion Plan ("Roll-Out Plan") All Networks
  - Testing of LRN - Intra Network and Inter Networks
  - Many Operational Issues
  - Cost Recovery Mechanism
  - Expansion of Workshop To Region Implementation (NPAC/SMS and LLC)

- **Phase II (1998 - 1999)**
  - Location Portability
  - Service Portability
  - Number Conservation/Pooling
  - Wireless Participation
  - Baseline LRN Enhancements
  - Billing Enhancements

Illinois Test Plan, Process Flows, and Roll-Out Plan

- Test Plan: 420 page Test Plan To Be Completed 12/1/96
- Testing Period 1/97 - 7/97
- FCC Report of Test Results Due 8/31/97
- Process Flows Developed - Ordering, Repair, Conflict Resolution
- LNP Number Portability Request Form Developed
- Roll-Out Master Plan Being Developed

ID	Task Name	Duration
1	**Initial LNP Implementation (all)**	465d
2	**LNP Preparation (all)**	444d
3		
4	**NPAC (all)**	290d
5	NPAC Deployment	149d
6	NPAC available for testing	75d
7	NPAC Full Operations	1d
8	*Op Team suggestd NPAC Testing*	129d
9		
10	**Electronic Order Interface Testing *****	1d
11		
12	**Initial Software avail/Testing**	328d
13	**EWSD (Ameritech)**	175d
14	EWSD Software (Lab)	1d
15	EWSD Lab Testing	60d
16	EWSD Test Town (JOLTILJODS1)	44d
17		
18	**5ESS (Ameritech)**	152d
19	5ESS Software (Lab)	1d
20	5E Lab Testing	60d
21	5ESS Test Town (CHCGILSTDS0)	66d
22		
23	**DMS 100 (Ameritech)**	111d
24	DMS Software (lab)	1d
25	DMS Lab Testing	60d
26	DMS Test Town (PKFSILPFDS0)	57d
27		
28	**DMS TOPS (Ameritech)**	110d
29	TOP's Software (lab)	1d



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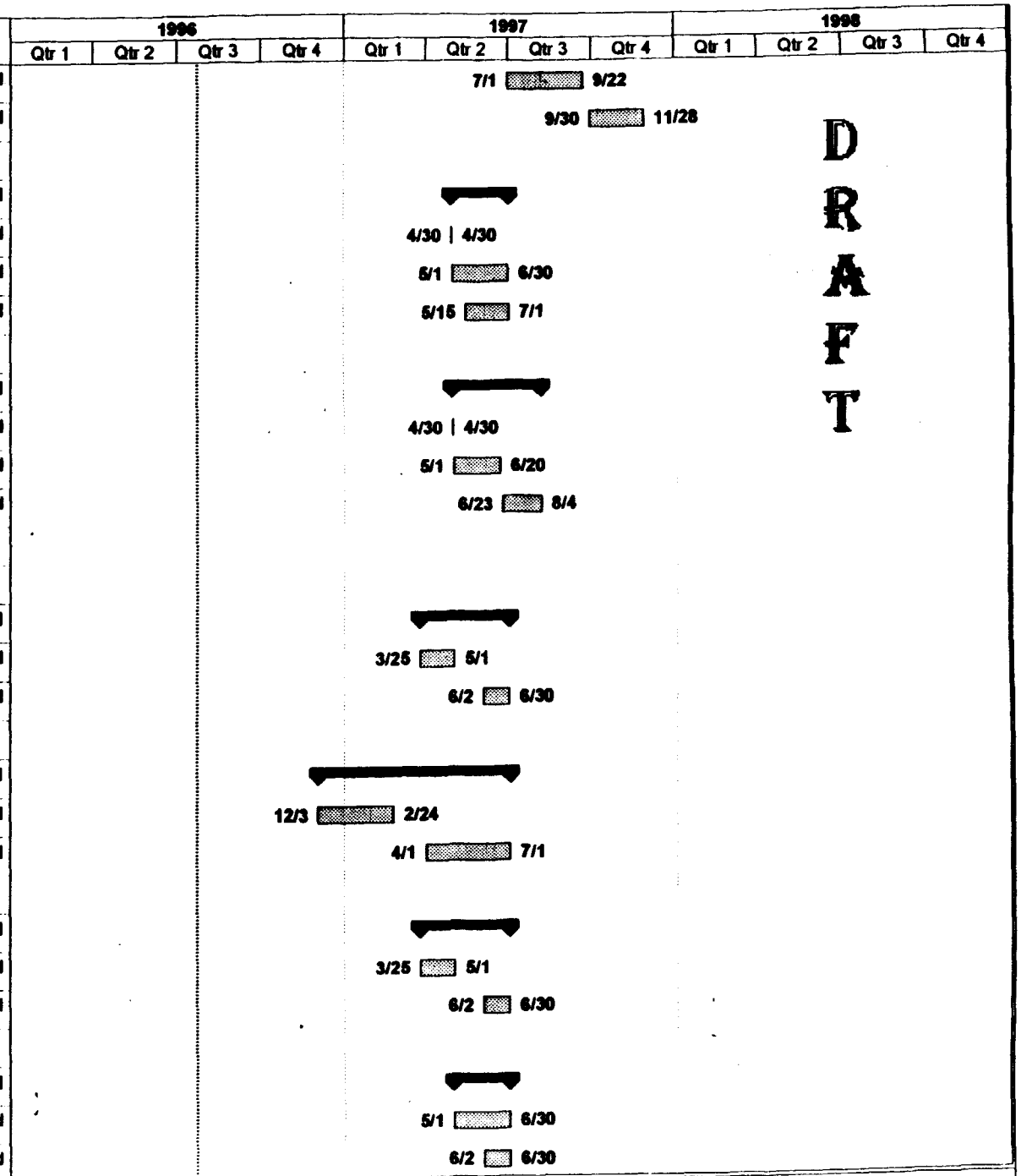
7/22/96 8:00 AM

ID	Task Name	Duration
30	TOP's Lab testing	60d
31	TOP's Test Town (CHCGILWB50T	44d
32		
33	4ESS (Ameritech)	45d
34	4ESS Software FOA	1d
35	4ESS Testing	43d
36	4ESS Test Town (CHCGILWB12T	34d
37		
38	1AESS (Ameritech)	69d
39	1AESS Software FOA	1d
40	1AESS Testing (Internal)	37d
41	1AESS Test Town (CHCGILSTCG	31d
42		
43		
44	AT&T Switch type 5ESS	70d
45	Lab Testing	28d
46	Test Town (TBD)	21d
47		
48	AT&T Operator Services Platform	151d
49	Lab testing ***	60d
50	Test Town ***	66d
51		
52	AT&T IXC Platform	70d
53	Lab testing***	28d
54	Test Town***	21d
55		
56	MCI Switch type DMS	43d
57	Lab Testing	43d
58	Test Town BNSVILDGDS0	21d



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