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Robert H. Jackson
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OCT 10 1996
Federal Communications Commission
Office of Secretary

October 10, 1996

William F. Caton, Acting Secretary
Federal Communications Commission
1919 M Street, N.W. Room 222
Washington, D.C. 20554

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

Dear Mr. Caton:

Today, Leila Gibson, Neil Knight and the undersigned on behalf of U S WEST met with Jim Keegan of the Office of Engineering and Technology and Mary De Luca, Jason Karp, Susan McMaster, Marian Gordon, Gregory Forbes, Kent Nilsson, Jeannie Su and Andre Copelin of the Common Carrier Bureau on the above-captioned proceeding. We discussed network reliability issues as they relate to number portability. We discussed the benefits of extending the completion dates to six months for the first two MSAs. Start dates would not be affected. We also discussed the issue of so-called "exempt" or "non-participating" providers not understanding their responsibilities to arrange to perform queries on calls to ported numbers. The attached handout was left with the Commission. Please include a copy of this letter and the attachment in the record in this docket.

Acknowledgment and date of receipt of this letter are requested. A duplicate letter is attached for this purpose.

Sincerely,

Robert H. Jackson

cc: Jim Keegan
Mary De Luca
Jason Karp
Susan McMaster
Marian Gordon
Gregory Forbes
Kent Nilsson
Jeannie Su
Andre Copelin

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Local Number Portability

CC Docket No. 95-116

U S WEST, Inc.

on behalf of

U S WEST Communications
and
U S WEST Media Group

The implementation of LNP is an enormous undertaking that has serious Network Reliability risks

- LNP is the largest single change to the network since direct dialing for toll calls
- The SS-7 network has never handled the amount of volume estimated for LNP. Today local calls do not require a query for completion; tomorrow virtually all local calls will require a query
- Many new Network Elements and Software need to be developed, installed, tested, and de-bugged prior to any live traffic
- **It is critical to thoroughly test these new/enhanced network elements in USWC prior to the implementation of LNP**
- **It is critical to phase in the implementation of the CO switches in an MSA over a sufficient period of time to ensure that the network does not crash**

It is critical to thoroughly test these new/enhanced network elements in USWC prior to the implementation of LNP

- The new Network Elements and Software includes:
  - New E.O. Switch Generics - New Regional SMS systems
  - New Tandem Switch Generics - New Oper. Srvs Switch Generics
  - New LRN software features - New Local SMS systems
  - New LNP SCP databases - New OSS system enhancements
- Some of these network elements are different from those being testing in the Chicago MSA, including SCPs, End-Office switches, local SMS, STPs, and Operating Systems
- Some of the Service Providers in USWC MSAs will be different from those participating in Chicago
- While the learnings from Chicago are essential, they do not guarantee success in other locations

It is critical to thoroughly test these new/enhanced network elements in USWC prior to the implementation of LNP (cont.)

- It is critical to schedule and implement very thorough test procedures in each location, including:
  - Testing of the new switch generics and LRN features on each switch
  - Testing between switches within the same network
  - Testing between network elements (switches, STPs, SMSs) of different Service Providers
- It is critical that sufficient time be allowed for a "First Region Application" so that the network elements and systems unique to a particular area can be sufficiently tested
- It is U S WEST's strong opinion that this type of testing, plus the conversion of 50+ Central Offices in the Minneapolis MSA can not be completed within a three month period of time, without seriously jeopardizing the network reliability

It is critical to phase in the implementation of the CO switches in an MSA over a sufficient period of time to ensure that the network does not crash

- LRN will introduce an unprecedented amount of traffic on the SS-7 network
- Minneapolis MSA has 54 End-Office switches (excluding remotes), 1.4 Million Access Lines and at least 5.57 Billion telephone calls annually based on 1995 data.
- Preliminary calculations indicate that the SS-7 traffic in the Minneapolis MSA will increase 280% over the current load with the implementation of LRN
- This significant increase of SS-7 traffic should be phased in over four to six months to ensure network integrity

The implementation of LNP within an MSA in 3 months has serious reliability risks, which can be mitigated by extending the implementation interval for the large MSAs to 6 months

- There is a need for sufficient time to complete intra-network and inter-network testing of new network elements, new network systems and new LNP Service Providers
- There is a need to phase-in the extremely high volumes of SS-7 traffic that will be introduced with LNP
- Testing and conversion of an entire MSA in 90 days will have serious network reliability implications
- Extending the implementation interval from 3 to 6 months will have minimal effect on competition (since interim methods are available - RCF), but will result in the significant reduction in network reliability risks
- State specific forums would be responsible for developing the detailed CO implementation schedules so that "hot" offices can be scheduled early

Despite substantial work on LNP there are still substantial unknowns that present network reliability risks.

- Ameritech will only test network components and operating systems it has in the Chicago MSA.
- USWC has different STPs, SCPs , some SSPs and, potentially, the SMS than Ameritech. USWC's operating systems are different from Ameritech's. Local calling areas with measured service such as Chicago may have different calling patterns that local calling areas with flat-rate service such as Minneapolis-St.Paul.
- The learnings from Chicago are essential. However, they will not guarantee automatic success in other networks because of differences in networks and operating systems. These uncertainties create risk to network reliability.
- Prudence dictates that these risks be minimized by extending the schedule for early LNP applications to six months, rather than three now planned.