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USWEST

Lawrence E. Sarjeant
Vice President-
Federal Regulatory

EX PARTE OR LATE FILED

EX PARTE PRESENTATION

December 5, 1996

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Federal Communications Commission
Office of Secretary

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

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

Dear Mr. Caton:

Attached hereto are two copies of a letter that was delivered today to Chairman Reed E. Hundt and Commissioners James H. Quello, Rachelle B. Chong and Susan Ness. In accordance with Commission Rule 1.1206(a)(1), two copies of the letter are being filed with you for inclusion in the public record. Acknowledgment and date of receipt are requested. A copy of this transmittal is provided for this purpose. Please contact me if you have questions.

Sincerely,

Lawrence E. Sarjeant

cc: Chairman Reed E. Hundt
Commissioner James H. Quello
Commissioner Rachelle B. Chong
Commissioner Susan Ness

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Richard D. McCormick
Chairman and Chief Executive Officer

USWEST

December 5, 1996

EX PARTE PRESENTATION

Chairman Reed E. Hundt
Commissioner James H. Quello
Commissioner Rachelle B. Chong
Commissioner Susan Ness
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

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

Dear Mr. Chairman and Commissioners:

I am deeply concerned that the current schedule for local number portability ("LNP") implementation will place consumers and businesses in our largest cities in serious jeopardy. The current schedule is inconsistent with tried and tested practices for complex national service rollouts, particularly those requiring substantial hardware and software changes. The local number routing method for LNP presents the local exchange industry with perhaps the most complicated and challenging deployment we have ever attempted, and it will have its greatest impact on the Signaling System 7 ("SS7") network, an area where undue risk must be avoided. Accordingly, I urge you to reassess the current rollout schedule. It can be kept aggressive, but at the same time respectful of sound engineering practices.

LNP is the most significant network change since divestiture and the implementation of equal access. Unlike the introduction of prior services, LNP cannot draw on existing architectures. Rather, LNP requires the deployment of a new (and still untried) architecture. It will require changes and upgrades to every network node and most provisioning systems. Additionally, network redesigns will require many switch and Signal Transfer Point ("STP") processor upgrades, including additional hardware and even the accelerated replacement of many 1AESS switches.

LNP will introduce an unprecedented amount of traffic on the SS7 network. U S WEST has 51 end office switches (excluding remotes), 1.5 million access lines and handles at least 5.5 billion telephone calls annually in the Minneapolis MSA. The LNP order will require a 200% increase in the amount of information passed through the SS7 network for each inter-switch call. This will require major growth in the SS7 network including additional links, switch ports and processors. U S WEST must deploy additional Service Control Points ("SCPs") to accommodate more than five times the number of database queries that we handle today. The industry has learned from SS7 outages that occurred in Los Angeles and Washington, D.C. in 1991 that SS7 technology troubles have the potential to propagate through the network very quickly and present significant containment and recovery challenges. Changes of the magnitude mandated by the FCC leave U S WEST susceptible to major network outages. Such vulnerability causes me great concern. U S WEST's concerns were presented in detail in its August 26, 1996, Petition for Reconsideration that was filed in this proceeding.

In the past, deployment of new network technology in the largest MSAs during periods of predicted high network usage has been avoided. In 1993, 800 number portability was delayed three months to avoid the upsurge in calling during the holiday season. Our customers have traditionally supported avoiding new service deployment and significant network changes between Thanksgiving and the New Year.

In addition, the LNP rollout is much larger than the recent network and systems modifications made to introduce toll-free 888 calling. The 888 rollout, which was only a modification of the existing 800 database and Interchangeable Numbering Plan Area architectures, was implemented on March 1, 1996, after almost one year's intensive planning and close monitoring by the Commission and the industry.

The FCC is requiring the local exchange industry to simultaneously introduce LNP service in major MSAs throughout the nation on virtually the same day, without regard for the differing equipment configurations and embedded services of each local exchange carrier. It will only be field tested in the Chicago area during mid-1997. While we expect much to be

learned in Chicago, success there does not guarantee success in the first applications of other local exchange carriers. The Ameritech Chicago network does not contain all of the same components as U S WEST's Minneapolis network. For example, Ameritech and U S WEST use different STPs, SCPs and operating systems configurations. The Ameritech trial cannot test equipment and systems that are not deployed in the trial network. The FCC's chosen implementation schedule poses unprecedented risks to the public switched network and is imprudent.

Finally, the aggressive deployment schedule ordered by the FCC has caused the vendor community to adopt the generic requirements for switches that were developed by the Illinois Commerce Commission ("ICC"). The ICC requirements are not nearly as comprehensive as those requirements developed in the past for major projects of this magnitude. In fact, the ICC requirements were not developed with full industry participation. As was done with other services in the past, the RBOCs chartered Bellcore to write requirements for LNP. However, vendors did not build to these comprehensive requirements due to the forced delivery dates that are the result of the FCC's ambitious LNP rollout schedule. I am frustrated by the fact that the current approach will unnecessarily increase U S WEST's deployment costs. We will pay costs associated with deployment consistent with the ICC requirements in order to meet the FCC's current schedule and pay additional costs to satisfy broad-based industry requirements that are not reflected in the ICC specifications.

With all of these concerns in mind, I ask that you defer the LNP implementation schedule by three to six months. This additional time will allow carriers such as U S WEST that did not participate in the Chicago trial to evaluate the results of the Chicago field test and react appropriately. Further, this additional time is needed in order to conduct stress, systems and other tests within our network.

As the FCC reconsiders its deployment schedule, it should observe the following principles:

> A National Approach to Service Introduction - Services that affect call completion or the SS7 network should be introduced only after a national testing and service introduction plan has been thoroughly considered and adopted.

Coordinated Laboratory Testing and Analysis - Affected carriers should have a reasonable opportunity to work with one another and their suppliers to coordinate testing for specific network configurations. Testing for any one configuration may be performed by individual carriers who would insure that comprehensive test plans are developed based on industry input. Results of this testing would then be shared among industry participants.

Controlled Service Introduction - Major technology and service changes to the network should be introduced in a single, small serving office and allowed to soak in that office for a reasonable period of time before there is widespread deployment throughout the network. U S WEST suggested a phased approach in its April 5, 1996, LNP filing. It began with a First Office Application of technology followed by regional testing of U S WEST's specific network components and systems (First Regional Application) and finally, by regional implementation in major MSAs.

U S WEST is committed to the introduction of competition and supports an aggressive, yet prudent, schedule for LNP deployment. Accordingly, I respectfully request that you reconsider your LNP deployment schedule in light of the considerations mentioned above.

Sincerely,

Richard D. McCormick

cc: Regina Keeney