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January 28, 1996

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

JAN 28 1996  
FEDERAL COMMUNICATIONS COMMISSION

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

Dear Mr. Caton:

Today, Frank Ianna, Vice President, Network Services, Harry Sugar and I, all of AT&T and John Gerdelman, Vice President, Network MCI Services and Len Sawicki, Director, FCC Affairs, both of MCI met, in separate meetings, with Commissioner Chong and her Senior Legal Advisor, Daniel Gonzalez; Commissioner Quello and his Senior Legal Advisor, James Coltharp; Commissioner Ness and her Senior Advisor James Casserly. The purpose of these meetings was to discuss AT&T's previously expressed views in the above mentioned proceeding. The attached material was used to facilitate our discussion on the impact of the location routing number (LRN) number portability solution on the network and the relative cost of the LRN and the query on release telephone number portability solutions.

Two copies of this Notice are being submitted to the Secretary of the FCC in accordance with Section 1.1206(a)1.

Sincerely,

A handwritten signature in cursive script that reads "Frank S. Simone".

Attachment

Enclosure

cc: Commissioner Chong  
Mr. Daniel Gonzalez  
Commissioner Ness  
Mr. James Casserly  
Commissioner Quello  
Mr. James Coltharp

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Handwritten initials "OJZ" written in a stylized cursive font.

CC Docket No. 95-116  
Telephone Number Portability

## Summary

***The record compiled since the Commission's Number Portability Order in June, 1996 confirms the original conclusions.***

- LRN provides the highest degree of network reliability.
  - Industry subject matter experts in 7 states and the switch manufacturers agree on this point.
- The significant cost of ILEC switching and trunking to make QOR queries to the default terminating switch are not accounted for.
  - Switching costs associated with the QOR call attempt represent the largest cost contributor.
- Only QOR treats calls to ported and non-porting numbers differently.
  - LRN is competitively neutral.
  - QOR violates the Commission's number portability performance criteria #4 and #6.

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**Network Reliability**

***LRN Provides the Highest Degree of Network Reliability***

- LRN has been thoroughly evaluated by subject matter experts throughout the industry at state commission-sponsored workshops and has consistently been rated with the highest degree of reliability.
    - *“By using LRN technology, Nortel public carrier customers are assured that the performance, reliability and capacity of their current network infrastructure will be maintained.”*
- Nortel Navigator-Vision, Nortel World Wide Web Site
- State commissions in Illinois, Maryland, New York, California, Georgia, Florida, and Colorado have endorsed LRN as the method for implementing permanent number portability in their states.
  - LRN implementation can be phased in over 3-4 months for the 4Q97 MSAs.
    - In Chicago, Ameritech’s end office roll-out is from 7/1/97 to 12/1/97.
  - Bell Atlantic, Pacific Telesis, and GTE in their 1/9/97 ex parte have overstated the increase in signal load *within* the area where LRN is being implemented *after* all NXXs have been activated. In all events, with a properly engineered signaling network and the phase-in described above, there is little risk.
    - US West estimates only a 40% increase in the load on its signaling network
- US West ex parte presentation, R.H. Jackson, January 16, 1997
- The greater risk is with QOR. With QOR, the signaling network is sized based on an estimate of the percent numbers ported.

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## **Signaling Network Load**

### ***Large Incremental Additions to the SS7 Network Have Occurred in the Past***

May, 1993

- 74 million intraLATA 800 messages per month.
- 2.13 billion interLATA messages per month added to the SS7 network in a nationwide “flash cut.”
- This amounted to an almost 3000% increase in the SS7 load.

*“Today, Bellcore’s systems handle every 800 number call in the country- over 50 billion calls a year, with zero unscheduled downtime over the past 5 years!”*

Local Number Portability: Implementation Strategies, Bellcore Seminar Advertisement

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**Network Reliability**

***Deploying Database Technology Within the SS7 Signaling Network:  
High Risk or Routine ?***

*The basic premise of the petition is factually incorrect. Petitioners repeatedly characterize 800 database as "new technology" and claim that the exchange carrier industry is intent on the "testing of new technologies on 'live' traffic." The fact is that exchange carriers have been using this technology, on live traffic, under effective state tariffs, since 1989. During that time, 800 databases have been used to route literally millions of calls -- without petitioners or the rest of the public even knowing it -- and have done so without incident.*

Bell Atlantic's Opposition to Financial Services Providers' Petition For Expedited Action  
CC Docket No. 86-10, Provision of Access for 800 Service [DA 92-1387], October 20, 1992

*Additionally, Petitioners' worries about the LECs' ability to install new technology is misplaced. Pacific routinely installs new switches and software in a seamless fashion without service interruption. Furthermore, the SS7 and 800 database technology being deployed has been in development for years. There is no need to postpone the implementation date for mandatory 800 database service.*

Comments of Pacific Bell and Nevada Bell  
CC Docket No. 86-10, Provision of Access for 800 Service [DA 92-1387], October 20, 1992

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## Planning Signaling Network Growth

*CLEC marketing initiatives will cause unpredictable porting rates throughout ILEC territories.*

For example

- ILEC sizes their signaling network to accommodate a 10% porting rate
- CLEC marketing initiatives drive the porting rate to 15%
- Calls to new entrant customers experience blockage due to insufficient ILEC signaling network capacity
- Only calls to new entrant customers are impacted, disadvantaging new entrants

*Accurately engineering signaling networks to accommodate forecasted porting rates in a highly competitive environment would require ILEC access to new entrant marketing plans.*

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## **Omitted QOR Costs are Significant**

- “It currently costs almost five times more to set up a call than to provide a minute of use.” The call set up cost is \$0.01621 per attempt.

*Pacific Bell Petition for Rulemaking to amend Section 69.106 of the Commission's Rules, June 30, 1994.*

- Call set up costs for unnecessary QOR queries to the wrong switch are 1) significant and 2) have been omitted by the RBOCs.

- In 1995, there were 291B IntraLATA Interswitch Call Attempts.

*AT&T calculation based on 1995 ARMIS data.*

***At 20% porting, QOR will make 58.2B Unnecessary  
Call Attempts at a Cost of \$943M.***