



CTIA

Cellular Telecommunications Industry Association

EX PARTE OR LATE FILED

August 25, 1998

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Magalie R. Salas
Secretary
Federal Communications Commission
1919 M Street, N.W. Room 222
Washington, D.C. 20554

Re: Ex Parte Presentation
CC Docket # 95-116 (Number Portability)

Dear Ms. Salas:

Today, August 25, 1998, the Cellular Telecommunications Industry Association ("CTIA"), represented by Michael F. Altschul, have attached, for filing, a letter to Steve Weingarten, Chief, Commercial Wireless Division, Wireless Telecommunications Bureau, with copies to several listed staff members.

Pursuant to Section 1.1206 of the Commission's Rules, an original and one copy of this letter and its attachments are being filed with your office. Also, four copies of these materials are being filed for your convenience. If you have any questions regarding this submission, please contact the undersigned.

Sincerely,

Lolita D. Smith
Lolita D. Smith

No. of Copies rec'd

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DATE





CTIA

Cellular Telecommunications Industry Association

August 25, 1998

Steve Weingarten, Esq.
Chief, Commercial Wireless Division
Wireless Telecommunications Bureau
Federal Communications Commission
2100 M Street
Washington, D.C. 20554

Re: Wireless Number Portability Standards Progress

Dear Mr. Weingarten:

The purpose of this letter is to provide the information you have requested regarding the industry standards process, as well as to inform the Wireless Telecommunications Bureau regarding the progress of industry efforts to meet the deadlines imposed by the Commission in the First Report and Order.¹ As you know, the Wireless industry is working diligently to meet the CMRS number portability deadlines. Any other conclusion is not only counterfactual, but reflects a misunderstanding of how the standards setting process operates and the complexities of implementing standards to support nationwide roaming.

Standards bodies typically break technical challenges into stages or phases – in order to direct and define the scope of their work and establish milestones commensurate with regulatory deadlines. Although these phases may vary according to the difficulties inherent to a particular technology or with the technical challenges facing a standards body, regulatory deadlines impose uniform considerations. The specifics of how different standards committees have divided up their work into *phases* are discussed below. However, Phase 1 generally represents industry efforts to meet the number portability query message deadline. Similarly, Phase 2 generally covers wireless carriers' ability to provide service provider number portability in the top 100 MSAs, and the ability to support nationwide roaming. Phase 3 generally covers more enhanced network features.

¹ First Report and Order and Further Notice of Proposed Rulemaking, 11 FCC Rcd. 8352 (1996), CC Docket No. 95-116 (“First Report and Order”).



In response to your request for information on the status of industry standards work for Wireless Number Portability ("WNP"), CTIA has compiled the following report. Currently, WNP standards are being worked in three separate Telecommunications Industry Association ("TIA") standards committees because the scope of this mandate touches nearly every aspect of network operations. This separation allows the various technologies to be worked in detail. These committees, TR-45.2, T1P1/TR-46, and T1S1.6 all work independently but have established liaisons to share relevant issues. After each committee divides the work volume into phases, it then issues *letter ballots* to the industry on 30-day or 60-day cycles for approval and comments.

Part of the problem and difficulty in predicting an exact standards deadline is due to the myriad of outcomes from the ballot process. As part of the standards setting process, TIA members may respond to comments in one of three ways: (1) Approved, (2) Approved with minor comments, or (3) Submitted back to the committee with extensive comments. If the standards committees receive extensive comments, then additional time must be spent resolving all associated issues before sending the standard back to the industry for re-ballot. As a matter of practice, it is not uncommon for extensive commenting and rebalotting when facing a difficult technical challenge.² This is the acknowledged TIA practice used to reach industry wide consensus.

TR-45.2

WNP standards for **IS-41** providers (cellular analog and digital CDMA and TDMA) are being worked in the **TR-45.2 Ad Hoc Committee for Wireless Number Portability**. This committee has completed a final review of the Phase 2 standard. The Phase 2 standard will allow wireless carriers to port numbers. TR-45.2 sent the document out for letter ballot this month, (August 1998) on a 30-day ballot cycle. This committee will review all ballots during September and will develop a schedule to resolve the comments. TR-45.2's work plan has targeted completion of the Phase 2 standard by the end of 1998. In addition, further work is ongoing for the Phase 3 of the WNP standard for these technologies. This phase covers more enhanced network features for Wireless Number Portability including Congestion control (ACG), Short Message Service (SMS), HLR optimization or enhancements, and Feature Interactions. Phase 3 will undergo the same balloting process and is scheduled for committee completion in the first quarter of 1999.

T1P1/TR-46

Similarly, WNP standards for GSM carriers are being worked in the **T1P1/TR-46 ATIS-TIA** committee. Phase 1, covering the number portability query message is already published. However, Phase 2 work addressing Short Message Service and number based

² Indeed, the TR-45.2 WNP committee received extensive comments and rebalotting for the Phase 1 standard. Phase 1 was defined as meeting the number portability query message deadline.

services is not scheduled for completion until the end of 1998. Once the committee completes its work, the standard will go out for ballot in the First Quarter of 1999, and be returned to the committee for any necessary modifications. Phase 3 standards work in this committee, covering roaming capabilities, is scheduled for completion the first quarter of 1999.

T1S1.6

Finally, standards efforts addressing wireline -- wireless interoperability issues is being handled in committee T1S1.6. This committee currently has three documents in the ballot stage, which closes August 26, 1998. T1S1.6 standards work includes:

- LB 702 Technical Requirements for Number Portability -Operator Services Switching Systems
- LB 703 Technical Requirements for Number Portability -Switching Systems
- LB 704 Technical Requirements for Number Portability- Database and Global Title Translation

The T1S1.6 workplan also schedules completion of these three standards by the end of 1998. If these technical standards are completed by December 1998, during the First Quarter of 1999, the industry can move forward to the next stage of implementation. Vendors can develop equipment and software that meets industry specifications once the standard has been published. Historically, this takes 18-24 months. Once the vendors have developed compliant products, the industry must test the network upgrades in a field trial environment to ensure the reliability, quality and integrity of the service. This process typically takes a minimum of 6 months and is of great concern to the industry.³ Testing for network reliability is critical for successful Wireless Number Portability implementation in a nationwide roaming environment.

It should be emphasized that the schedule adopted by these standards committees is unprecedented, and the workplans are moving quickly towards completion. Committee members are meeting each month to complete the technical standards. However, vendors cannot develop the necessary network upgrades until these standards are completed. Likewise, the wireless industry cannot test network reliability until all the hardware and software upgrades are available from the vendors. Therefore, it is clear today that the minimum requirements to perform wireless number portability will not be in place on June 30, 1999.

³ See Comments of The Cellular Telecommunications Industry Association filed August 10, 1998, CC Docket No. 95-116 (responding to the Wireline Wireless Integration Report); See also Ex Parte Letter regarding Nine Month Extension of Implementation Deadline Applicable to CMRS Providers for Telephone Number Portability filed by CTIA, August 13, 1998.

Sincerely,

Michael F. Altschul / LS

Michael F. Altschul

cc: Jeanine Poltronieri
Janice Jamieson
Clint Odom
Paul D'Ari