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Communication Industry Services

White Paper on a Neutral Third PIC/CARE Clearinghouse

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NEUTRAL THIRD PARTY PIC/CARE CLEARINGHOUSE

White Paper

Introduction

In response to a recent order of the Federal Communications Commission,[1] several major interexchange carriers (IXCs) have asked Lockheed Martin Communications Industry Services (CIS) to assess the feasibility of a centralized, neutral third party administrative system to both process and track carrier selections (PICs) and PIC freeze protections. This White Paper identifies one way that a Neutral Third Party PIC Clearinghouse (NTP) could be designed and operated. As in any project of this scope, a number of operational details and refinements remain to be worked out. Nevertheless, CIS believes that the NTP system described in this paper is a technically feasible method of processing and tracking PIC data and a solution that will introduce efficiencies and other advantages over the current PIC administration system. Indeed, while detailed costing data is not yet available, CIS believes that the NTP system will cost less, and certainly will not cost more, than the current system.

The remainder of this paper describes the responsibilities of the NTP, its structure, and how it would operate to discharge its responsibilities.

Neutral Third Party Overview

The NTP would offer a common, centralized and neutral administrator to process and track PIC changes, and would eliminate the need for the existing direct process of data exchange between the IXCs and Local Service Providers (LSPs). In addition, the NTP would eliminate or alleviate a number of related problems, such as:

- Absence of fully functional, interactive PIC/Customer Account Record Exchange (CARE) systems in many new LSPs' back offices;
- Multiple LSP PIC/CARE record formats and processing standards that create an unmanageable and cost-prohibitive process for many IXCs.[2]
- Reduce opportunities for either intentional or unintentional PIC changes "slamming" as well as better identify the responsible party

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[1] Second Report and Order and Further Notice of Proposed Rulemaking, In re Implementation of the Subscriber Carrier Selection Changes Provisions of the Telecommunications Act of 1996, Policies and Rules Concerning Unauthorized Changes of Consumers' Long Distance Carriers, CC Docket No. 94-129, FCC 98-334 (December 23, 1998) paragraph 184.

[2] In 1983, the Alliance for Telecommunications Industry Solutions (ATIS) was created to solve these kinds of problems, and participation is open to all other interested parties. Specifically, the OBF (Ordering and Billing Forum) includes a Subscription Committee that provides a mechanism for the resolution of national subscription issues and maintains the Equal Access subscription and CARE document. Notwithstanding the presence of standards, compliance is voluntary and not all participants use the latest release version. Thus, the need to support multiple versions of PIC/CARE records exists under the current process and would have to be supported under the proposed NTP system as well.

The NTP would be established under FCC guidelines, and would replicate, and in many circumstances replace, the Interexchange Carrier Service Centers (ICSCs) operated by incumbent local exchange carriers (ILECs). The ICSCs currently are housed in Regional Subscription Systems (RSS) centers that the Bell Companies, GTE, and some Independent Telephone Companies implemented in the mid-1980s. It is expected that this NTP service center would work with the entire industry in a neutral and evenhanded manner to improve the PIC processing process.

Scope Of Neutral Third Party Responsibilities

The NTP would replace many of the functions of the ILECs' ICSCs. The NTP would perform these functions for PIC orders in a host of circumstances, including:

- Initial choices of interLATA and/or intraLATA toll PIC made at the time a customer establishes dial-tone with the LSP;
- InterLATA and/or intraLATA toll PIC changes initiated by customer contact with the LSP;
- InterLATA and/or intraLATA toll PIC changes initiated through telemarketing and other carrier or customer initiated contact.

At a high level, the NTP would perform the following functions:

- Receive PIC transactions from the participating carriers in the form of a mechanized CARE record or other recognized CARE-type document;
- Provide access to the PIC service center for the mechanized transfer of CARE records through diverse network interfaces;
- Types of network access supported include dedicated, frame relay, and dial-up internet access;
- Receive bulk, magnetic tape or direct data transmitted CARE records at the PIC service center;
- Accept "emergency" or high priority PIC changes by fax, internet email or telephone call;
- Distribute all relevant CARE records and ensure receipt of appropriate confirmation records;
- Maintain and operate a call center in conjunction with other service center functions;
- Keep accurate and detailed records that track the processes and procedures employed by the NTP;
- Ensure security and confidentiality of all carrier PIC records and customer information.

For consistency, accuracy and completeness, all PIC records would be sent to the NTP by all LSPs and IXCs providing service within certain defined geographic areas, and all PIC and PIC-freeze orders would be subject to the same verification standards that are in place today and required in the future.

In addition to facilitating PIC and PIC-freeze ordering transactions, the NTP would provide carriers real-time access to customer PIC-freeze data in order to eliminate an

enormous cost of the present PIC administration system: the "rejection" of PIC orders because, unbeknownst to the submitting carriers, the customers' lines are PIC-frozen. The NTP could also augment the efficiency and accuracy of the industry's proposed Third Party Liability Administration system by tracking PIC orders involved in slamming disputes. The NTP could reduce the overall costs of the Third Party Liability Administration center through the combined utilization of common systems and databases.

Assumptions

Service bureaus have been standard fixtures in the industry since Divestiture and are utilized by many IXCs and LSPs for various "back office" functions. Members of the telecommunications industry have found service bureaus to be an economical and time saving alternative to building their own internal systems and entering into various business agreements with many different carriers.

Many service bureaus provide "clearinghouse" type services on behalf of their carrier customers. The NTP is a natural extension of a service bureau that facilitates the flow of records (information) from one carrier (IXC) to multiple recipients (numerous LSPs) and from multiple carriers to a single recipient. This is the classic "one to many," or "hub" business model, which the NTP "clearinghouse" would emulate.

Because service bureaus and clearinghouses are such common elements in the telecommunications industry, the business rules and service elements of the NTP would mirror most existing business models.

Following are the assumptions that would guide the development of the NTP system:

- The NTP would comply with all federal and applicable state rules and regulations governing the PIC process;
- The NTP would be capable of implementing full-scale commercial service nationwide following any appropriate initial trial that might be conducted;
- Contractual relationships would need to be entered into by the NTP with the participating carriers, both IXCs and LSPs;
- The FCC would mandate participation of all LSPs and IXCs providing services within a designated geographical area or region, subject to appropriate waiver rules and/or flexible participation mechanisms;
- The NTP would develop specified procedures to facilitate the voluntary opt-in of other carriers into the service;
- The opt-in process would be both flexible and open-ended, thereby permitting carrier entry at any point of time in the future;
- Entry could be on a per carrier basis or through the sponsorship of any recognized and authorized industry trade association on behalf of its entire membership;
- All PIC orders generated by telemarketing efforts would require the same FCC-defined verification procedures that are currently in place for outbound telemarketed sales;

- CARE would be used by the general carrier community as the standard PIC record format;
- CARE/Industry Support Interface (ISI) would specify the types of PIC transactions that can be contained on the same file, thereby allowing for multiple types of PIC transaction transmissions;
- The NTP would communicate and give notice to the industry as to the general availability of the service center through FCC press releases, FCC website notices, and communications to state regulatory and Attorney General organizations;
- The NTP would communicate with industry trade associations and organizations as to the roles and responsibilities of the NTP in relationship to the carrier community;
- The NTP will promote an acceptable collaborative process for the handling of the PIC and CARE records.

NTP Architecture

As stated earlier, he NTP would replace current intercarrier coordination functions performed by the LSP at its ICSC. Housed in a single center, IXCs and LSPs would be connected to the NTP's central facility through dedicated or dial-up access lines. IXCs and LSPs already obtain access to the industry-developed centralized Line Number Portability database through similar means. This centralized NTP architecture would result in savings for all carriers. IXCs would not need to maintain links with existing LSPs or establish new links with the new LSPs. Similarly, LSPs would not need to establish links with each other.

The NTP would house a PIC/CARE Processing System that would first ensure PIC orders are submitted in a standard format, and make certain first level typographical and content edits. The NTP also would contain the software and systems capability of receiving the PIC/CARE record in one version of the CARE ISI format and converting or modifying the record into another instance or version of the CARE ISI format. This is an important industry need as there may be different software versions of the CARE ISI record format that would be in use by the LSPs and IXCs in any given region. Differences between the CARE ISI formats can cause a disruption in the transfer of PIC/CARE records between the IXCs and LSPs, therefore creating a need for the NTP to rectify this situation through a PIC/CARE Protocol Converter. Another function of the PIC/CARE Protocol Converter would be to accept PIC records from the sender in any form and be able to distribute PIC/CARE records to the receiver in any form. This is an important consideration where some new entrant LSPs may only be able to send and/or receive PIC/CARE records as a fax, e-mail, or other type of medium.

The Processing System would then easily sort the records by NPA for storage and easier retrieval. It also would generate PIC/CARE records for delivery to the LSP. The LSP in turn would transmit the records to its existing PIC/CARE system, which would download the necessary information to the proper switch for call processing in accordance with the customer's selections, as is done today. The Processing System also would generate appropriate PIC/CARE records for the PIC'd IXC and OUTPIC record(s) for the carriers that lost the customer.

Although the NTP would house a large number of records, the data storage and retrieval needs of such a centralized system are quite manageable and commonplace in both telecommunications (National Directory Assistance) and other industries (Credit Card). The CARE record consists primarily of the customer's name, telephone number, intraLATA toll PIC, interLATA PIC, freeze status, and type of customer selection. The CARE record also allows the inclusion of a unique identifier (up to nine, alphanumeric digits) that could contain the customer's last four digits of their social security number or other PIN that can be used to verify the authenticity of an order. Moreover, because of the North American Number Plan, the records could easily be sorted into regional databases. Storing the records in regional databases would reduce the costs and increase the ease with which records could be retrieved and updated.

The NTP also would house facilities necessary to handle various types of inquiries. First, as described in more detail below, in certain circumstances, customers could be referred to the NTP for information concerning the carriers that provide intraLATA toll and interLATA services in their areas. Standard programmable audio response units (ARUs) could provide the necessary information using telephone tree logic and information supplied by carriers serving the affected areas. At the end of such recordings, customers could be given the option of placing their intraLATA toll or interLATA selection either directly with NTP or through standard ARUs.

Second, while the informational and ordering functions described above could be provided through automated equipment, some live operators would be necessary to answer customers' questions. Callers entering through the ARU, therefore, could be advised that they could switch to a live operator at any time during the recorded announcement if they so desired.

It is anticipated that the costs of the automated equipment and call centers would be offset by the reduced need for certain verification services and more efficient customer selection conversion process.

In addition, the NTP would enable carriers to determine on a real-time or mechanized basis the PIC-freeze status of lines. Carriers could access this information on a real-time basis in one of several simple ways. For example, carriers could obtain access through a voice-response system that allows them to dial the customer's 10-digit telephone number to determine if it is frozen. Alternatively, carriers could obtain access through secure websites, or by using dedicated high-speed links that allow the carrier to query the database directly. If the marketing carrier determines through one of these access methods that the line is not listed, the carrier would know that the customer's service can be switched, and could process the PIC order accordingly given the appropriate end user approval.

If the line is listed and the customer wishes to unfreeze the line, one of several options could be made available. First, the marketing carrier could do a "hot transfer" to the NTP. Customer Service/Call Center personnel at the NTP could confirm that the customer wishes to lift the freeze and could ask for the last four digits of the customer's social security number as a security measure. These customer security codes would be

stored in the PIC-freeze database, in a partitioned file inaccessible to the carriers that have access to the list of frozen lines. (Standard software protocols would link the freeze status data and line number for easy retrieval by the NTP personnel with access to the freeze status data.) Over time, as the database was populated with security codes, marketing carriers would no longer need to transfer customers to the NTP. Third party verifiers could instead ask the customer for the last four digits of the social security number, then use that number to obtain a validation from the database that the customer has supplied the requisite code. The carrier could then include a validation code on the PIC form and submit the PIC order. Upon receipt of the correct code, the database itself would both issue the validation code and turn the PIC-freeze indicator bit "off." Accordingly, over time the size and expense of the "hot transfer" center would be reduced or eliminated.

The PIC-freeze database would be populated with relevant data through a migration from the LSPs. This information is presumably stored in a centralized manner in order to facilitate the LSPs' ability to identify PIC change orders that are inconsistent with customer freezes. Accordingly, downloading this information from a centralized data facility should be relatively easy and inexpensive.

Funding of the NTP personnel who would handle any "hot-transfers" could be limited to those carriers who wish to avail themselves of this capability. It is anticipated that the costs of these facilities and personnel would be more than offset by substantial savings in carrier marketing expenses. IXCs estimate that 20-30% of all PIC selections are rejected due to undetectable PIC freezes. A system that enables carriers to eliminate this rejection rate (and the very significant marketing expenses associated with it) would be highly valued and would provide significant savings to marketing carriers. It also would yield savings to LSPs, who would no longer be required to maintain and update such databases themselves.

Order Processing – Business Overview

The following is an overview of the existing Regional Subscription System (RSS) processes employed by the Bell Companies and GTE and the proposed changes to these processes through the adoption of the NTP.

New Connect Orders (initial customer requests)

Current process. In today's environment, when a new telephone service customer calls the incumbent LSP to arrange for local service, the company's personnel negotiate the local service needs first. If the customer has not already contacted an IXC for interLATA service and has no carrier preference, the telephone company personnel read a list of available carriers to the customer. This list is supposed to be re-ordered on a monthly basis to maintain neutrality.

For intraLATA service, the LSP personnel are allowed to promote the telephone company's intraLATA toll services. Only if the new customer asks what other carriers are available to provide intraLATA toll services would the telephone company personnel

share the list of other available carriers, if any, with the customer. This list is supposed to be re-ordered on a monthly basis to maintain neutrality.

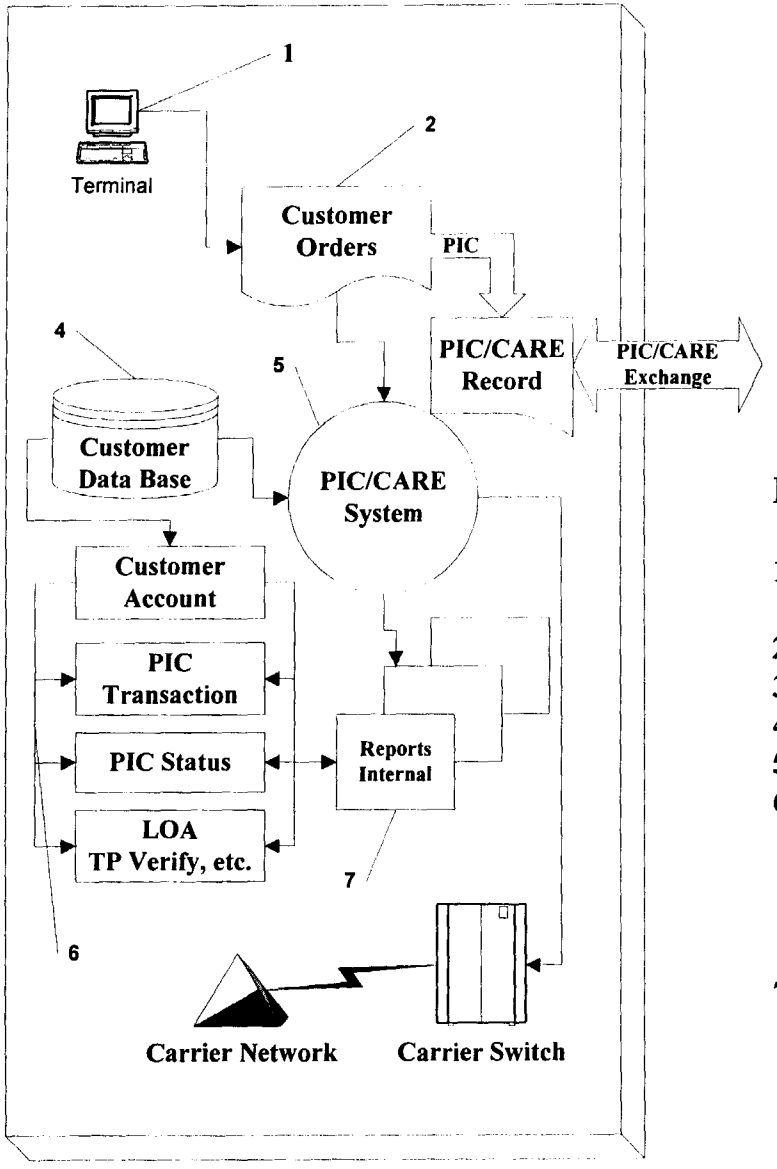
Thus, in the case of every new customer order, the incumbent LSP accepts and processes both an interLATA selection and an intraLATA toll selection regardless of the intraLATA carrier chosen.

The incumbent LSP enters the appropriate customer and carrier selection information into its CARE Records Processing System through its ICSC. That information is transmitted to the PIC/CARE system, which stores the information in the incumbent LSP's customer data base, and forwards information concerning the customer account, PIC status, and PIC Switch translation to the switch serving the customer's local line. The incumbent LSP notifies the IXC selected for interLATA service (and for intraLATA toll service if the customer does not choose the LSP) by forwarding a copy of the PIC/CARE record(s) to the IXC, either by transferring the data by magnetic tape, faxing the record(s), or transferring the data electronically over dedicated or dial-up access. If the customer chooses the incumbent LSP for intraLATA toll service, the LSP simply retains the IntraLATA toll PIC/CARE record, and transfers only the interLATA PIC/CARE record. If the customer selects the incumbent LSP for both intraLATA toll and interLATA service, only an OUTPIC record is transferred to the carrier that lost the customer, but the losing carrier does not learn that the customer switched to its interLATA service to the incumbent LSP.

Proposed NTP process for new connects customers. This paper takes no position as to whether the Commission should adopt different information disclosure and marketing standards for incumbent LSPs and other LSPs when customers call to establish local service. Rather, the paper assumes that a customer could select intraLATA toll and interLATA service providers through any of the following means: 1) through the incumbent LSP or other LSP; 2) through an IXC that the customer calls after learning of its carrier options; 3) or through the NTP itself. Under the proposed system, orders could be placed with the NTP if the incumbent LSP or other LSP chooses to (or is required to) transfer to the NTP those customers who wish to learn what their choices are. In such situations, the NTP would simply identify the available intraLATA toll and interLATA service providers in the customer's area through automated systems in the first instance, with an option to talk to a live operator if the customer so desired. The NTP would offer no service details or recommendations, and it would be incumbent on service providers to inform the NTP where they provide intraLATA toll and/or interLATA service. The customer could then inform the NTP of his or her choice for intraLATA toll and interLATA service provider(s), or contact the intraLATA toll and/or interLATA service provider(s) directly for further information on services and dialing plan options.

At the end of the installation process, the NTP would receive PIC orders for intraLATA and interLATA toll services either from the LSP, the intraLATA toll/interLATA carrier(s) (after the latter make service arrangements with the customer directly), or the customer directly. In all such cases, the NTP Processing System would sort the records by region and download the information to the appropriate regional database for storage. It also would generate PIC/CARE records for delivery to the LSP, which would download

Interexchange Carrier



Neutral Third Party PIC/CARE Clearinghouse Process Description

Interexchange Carrier Process

1. Customer orders 1+ service from IXC
   *Service may be interLATA, intraLATA or both
2. IXC processes customer order and creates a PIC/CARE record
3. IXC transmits PIC/CARE record to the NTP PIC Clearinghouse
4. IXC internally creates and stores customer record in a data base
5. IXC internally stores customer PIC record for future action
6. IXC creates a customer account profile:
   - account number
   - PIC transaction
   - PIC status
   - Type of verification used
7. IXC internal reporting on PICactivities

the necessary information to the proper switch for call processing in accordance with the customer's selections. The LSP would then transmit appropriate PIC/CARE confirmation records to the PIC'd intraLATA toll and/or interLATA service provider(s) and to the NTP. For more information concerning the data flow, see Exhibit 2.

Changes Initiated Through Marketing

Current process. At present, IXCs devote a substantial amount of time and money attempting to persuade customers to switch their services from one IXC to another. As intraLATA toll competition increases, these marketing activities would increase, and would include LSPs as well as IXCs.

Today, IXCs contact prospective customers, often through outbound-telemarketing channels, and market their services to them. The telemarketing IXC has no way of knowing whether the customer it has contacted has a PIC-freeze in place on a line, and customers themselves often do not remember or know. If the customer agrees to switch his or her service, the IXC performs a third-party verification to confirm the change. If the marketing occurs during normal business hours, the IXC can attempt to contact the LSP to determine whether there is a PIC-freeze in place. This option is not available, however, when most telemarketing is conducted. At the end of the process, the IXC sends a PIC change to the customer's LSP informing the latter that the customer has changed its preferred IXC. It has been estimated that approximately 20-30% of all PIC orders that IXCs submit to LSPs are rejected because the customer has placed a freeze on his or her line. For orders that are not rejected, the LSP enters the appropriate customer and carrier selection information into its CARE Records Processing System, and the information is transmitted to the switch serving the customer's local line. The LSP notifies the IXC selected for interexchange service by forwarding a copy of the PIC/CARE record(s) to the IXC, either by transferring the data by magnetic tape, faxing the record(s), or transferring the data electronically over dedicated or dial-up access. It also informs the carrier that lost the customer by transmitting an "OUTPIC" record to that carrier through the same media.

Proposed NTP process. Under the proposed NTP process, there are at least two scenarios. Under the simplest scenario, the marketing carrier would contact the customer, perform the necessary third-party verification, and then submit a PIC change order to the NTP over the data links described above. The NTP Processing System would download the information to the appropriate regional database for storage and generate PIC/CARE records for delivery to the LSP, which would download the necessary information to the proper switch for call processing in accordance with the customer's selections. The NTP also would transmit appropriate PIC/CARE records for the PIC'd intraLATA toll and/or interLATA service provider(s), as well as any OUTPIC record to the carrier(s) that lost the customer.

Under the second, and more robust scenario, the marketing carrier would receive authorization by the customer to switch his/her service, and then access the customer's PIC-freeze status data at the NTP. As described above, the NTP database would store information on all PIC-frozen lines and could be accessed on a real-time basis by marketing carriers. If the line were not listed, the marketing carrier would know the

customer's service could be switched, and the transaction would then proceed as described in the previous paragraph. If the line is listed, the marketing carrier would inform the prospective customer of this fact and ask the customer if he or she wished to unfreeze the line. If the customer elected to do so, the marketing carrier could use one of the methods described above (*i.e.*, "hot transfer" to the NTP, three-way calling to the LSP, or security code validation once available) to enable the customer to lift the freeze. The transaction then would be completed as described above. (See Exhibits 3 and 4)

PIC-None End Users

Current process. A "PIC-None" account status for intraLATA service may be implemented at the customer's request or result from a collections and treatment problem with the LSP. In other words, the customer has not paid his or her bill, and service has been restricted to incoming calls and emergency telephone access (*i.e.*, 911).

Proposed NTP process. Recognizing that customers have the right to select a PIC-None status on their accounts, it is in the best interests of the carrier community to have this PIC information stored by the NTP. Having the PIC-None customer account information reside within a NTP would guarantee that these consumers receive the opportunity to receive and accept other service offers from exchange carriers that may wish to extend local and/or interexchange services to this segment of the population. Indeed, there is a growing service segment that focuses on providing service to such end users.

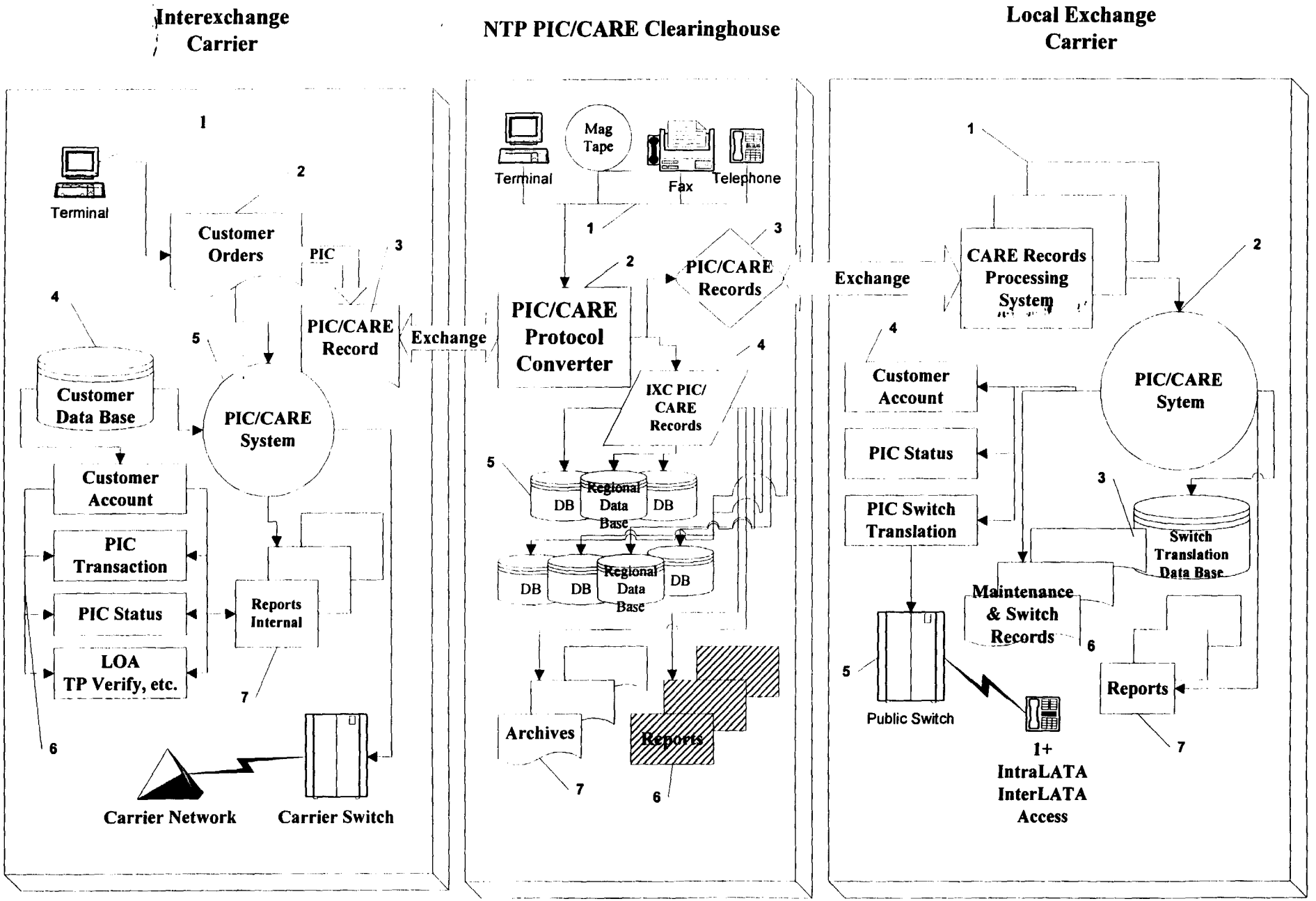
Fixing Slams/Implementing PIC-Freezes

Current process. At present, IXCs have no ability to freeze their customer's PIC selection(s) or to switch slammed customers back to their services. Instead, in both instances the IXC can only instruct the customer to contact the LSP and request assistance.

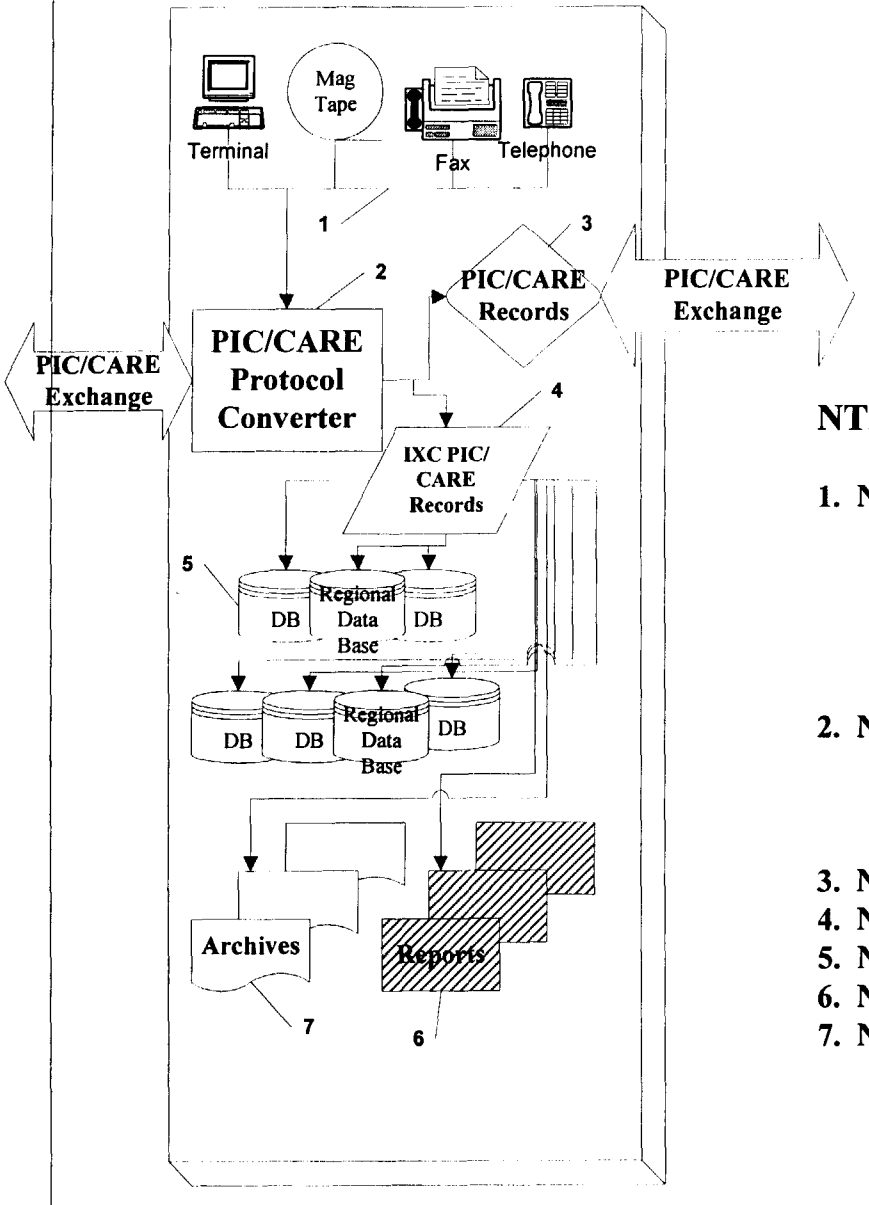
Proposed NTP Process. Under the NTP system, all carriers would be able to act on their customers' behalf to resolve problems or provide assistance. Thus, if a customer called his or her IntraLATA toll or InterLATA carrier and complained that he or she was slammed, the carrier could immediately call the Third Party Liability Administration center to report the "slamming" incident. A primary responsibility of the Third Party Liability Administration center would be to send a PIC-Restore record to the NTP in order to move the customer back to their authorized IXC.

Similarly, if a customer wished to impose a PIC-freeze on his or her line, the carrier could inform the NTP of this fact, either at the time service was installed or at a later time. In order to provide security measures, the carrier could do a "hot transfer," so that the customer could provide the NTP with the last four digits of his/her social security number. The NTP would then enter the line number and security code into the PIC-Freeze status database.

Neutral Third Party PIC/CARE Clearinghouse
Architecture and Service Map



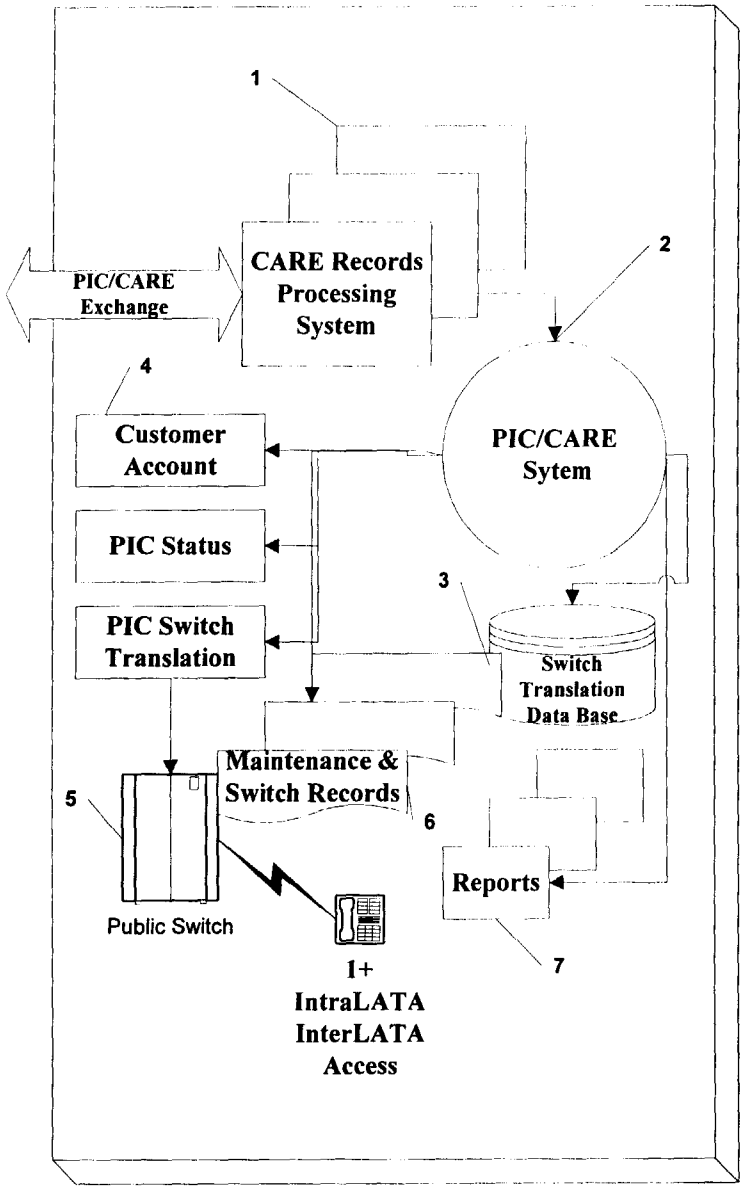
NTP PIC Clearinghouse
National Subscription System



Neutral Third Party PIC/CARE Clearinghouse
Process Description

NTP PIC Clearinghouse

1. NTP receives PIC information and PIC/CARE records from IXC or LEC:
   - Electronically
   - Bulk (magnetic tape, diskette, etc.
   - Facsimile
   - HTTP internet
   - Telephone
2. NTP enters PIC/CARE record into the PIC/CARE Protocol Converter:
   - Preliminary record edits
   - Logging and tracking
   - Reformating of the PIC/CARE record as needed
3. NTP transmits record to appropriate Local Exchange Carrier
4. NTP creates PIC/CARE storage record with IXC profile
5. NTP sends PIC/CARE record to regional storage data base
6. NTP creates multiple internal and external reports and billing statements
7. NTP sends completed PIC/CARE records to archives as data base ages off

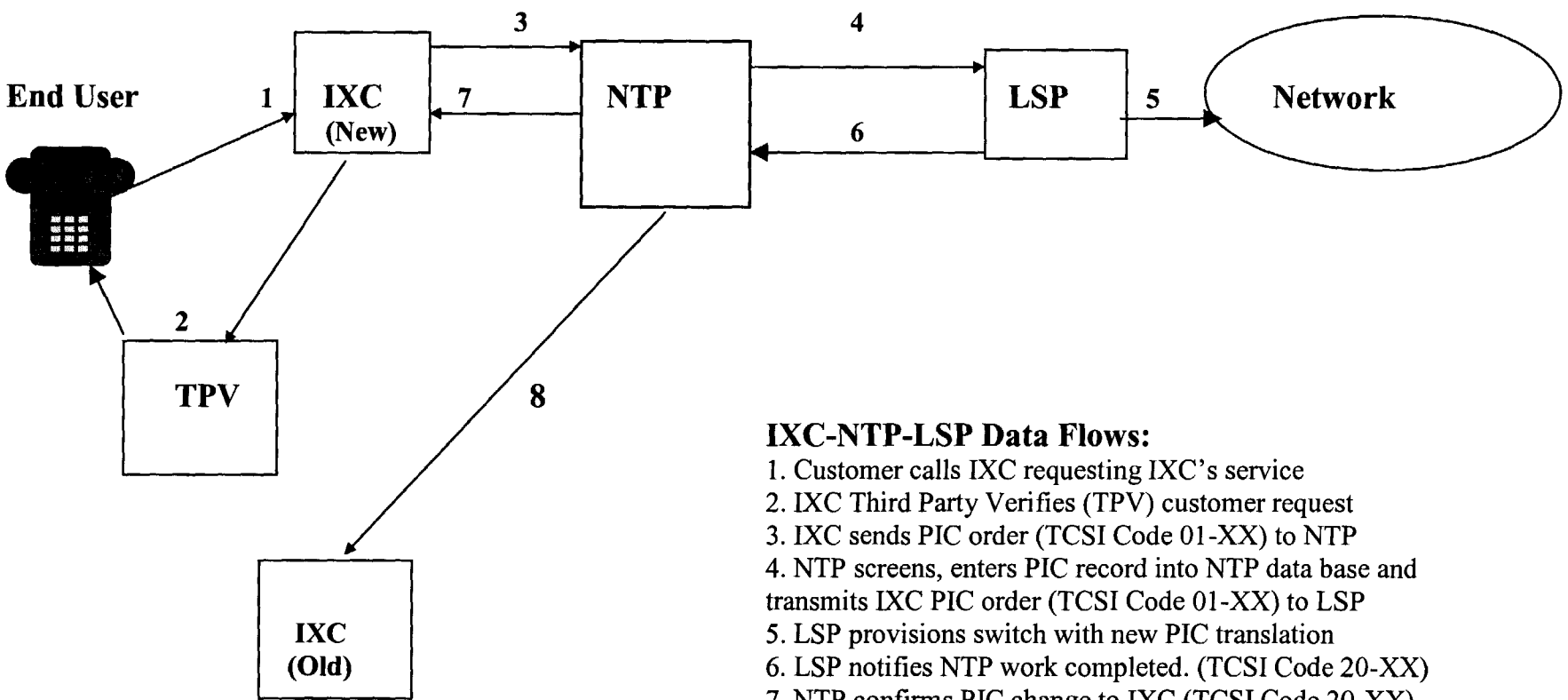


Neutral Third Party PIC/CARE Clearinghouse Process Description

Local Exchange Carrier

1. LEC receives PIC/CARE records from the NTP
2. LEC enters records into existing PIC/CARE system
3. LEC stores the PIC/CARE records in a customer data base
4. LEC's PIC/CARE system creates pending records:
   - Update customer maintenance record or creates new record
   - PIC status record
   - Switch PIC record
5. LEC performs switch translation for customer
6. LEC updates maintenance records reflecting new PIC(s)
7. LEC creates internal and external reports and bill statements

New Service Scenario
End User Selects IXC

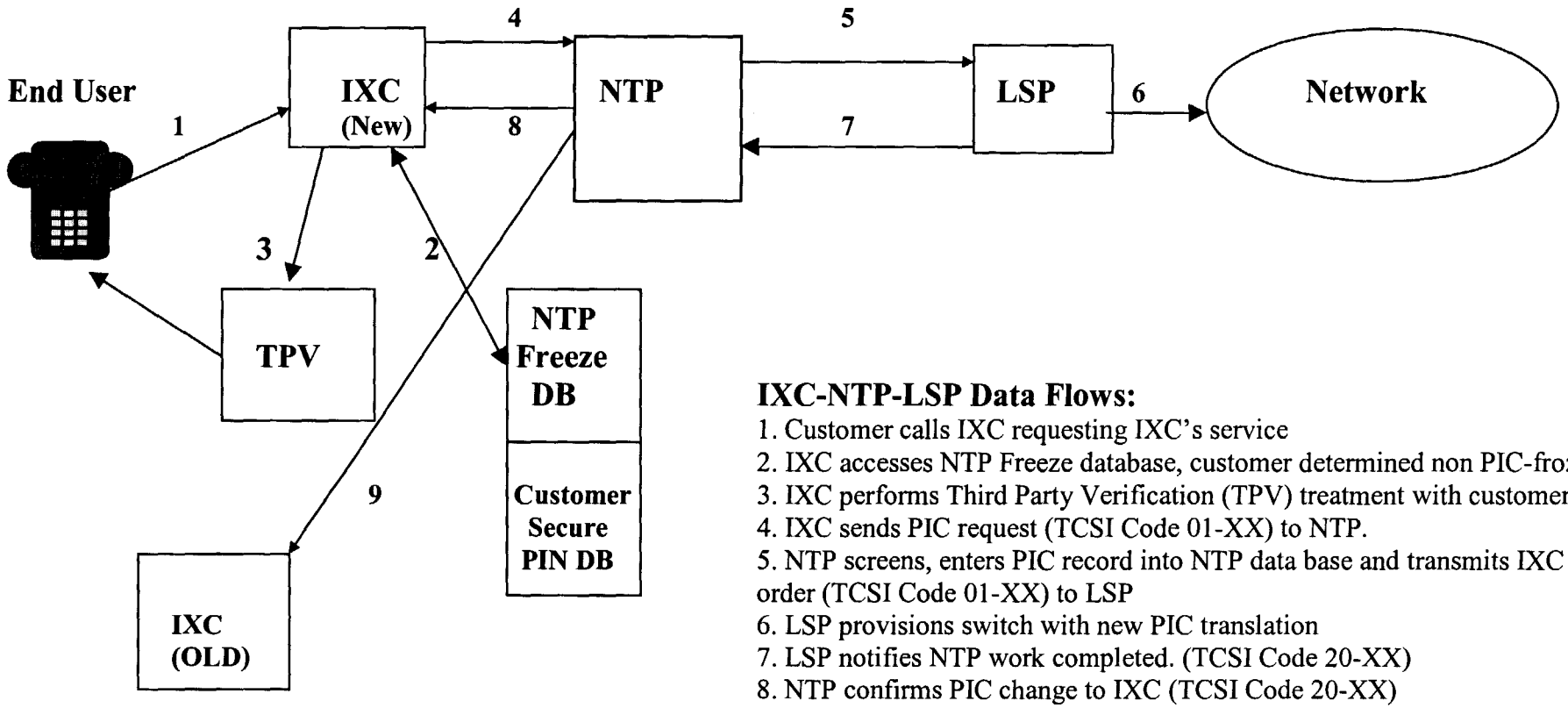


IXC-NTP-LSP Data Flows:

1. Customer calls IXC requesting IXC's service
2. IXC Third Party Verifies (TPV) customer request
3. IXC sends PIC order (TCSI Code 01-XX) to NTP
4. NTP screens, enters PIC record into NTP data base and transmits IXC PIC order (TCSI Code 01-XX) to LSP
5. LSP provisions switch with new PIC translation
6. LSP notifies NTP work completed. (TCSI Code 20-XX)
7. NTP confirms PIC change to IXC (TCSI Code 20-XX)
8. NTP notifies old IXC of OutPIC. (TCSI Code 22-XX)

TCSI= CARE Transaction Code/Status Indicator

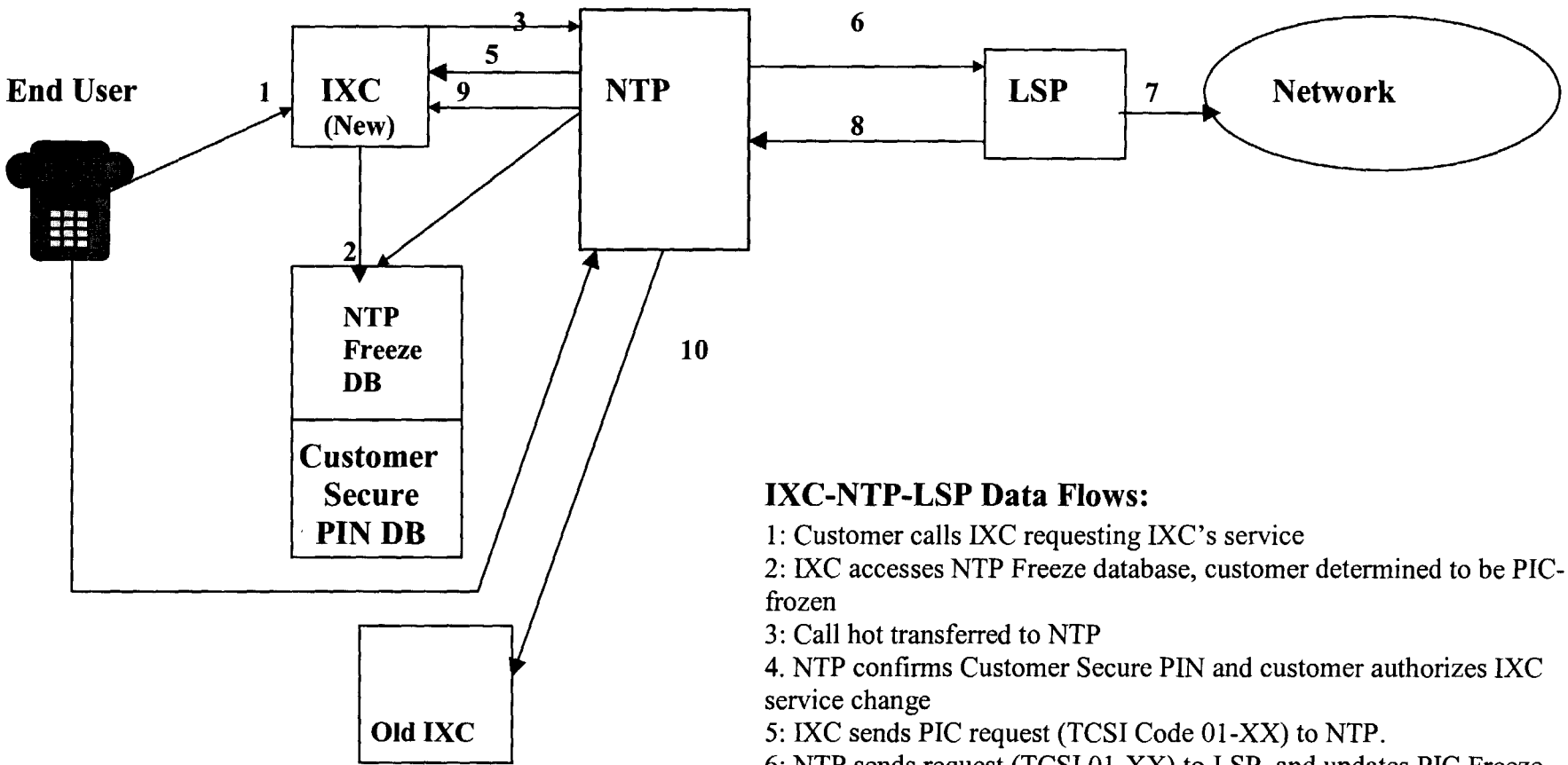
Non-Frozen PIC Scenario
Existing End User Changes IXC Services



IXC-NTP-LSP Data Flows:

1. Customer calls IXC requesting IXC's service
2. IXC accesses NTP Freeze database, customer determined non PIC-frozen
3. IXC performs Third Party Verification (TPV) treatment with customer
4. IXC sends PIC request (TCSI Code 01-XX) to NTP.
5. NTP screens, enters PIC record into NTP data base and transmits IXC PIC order (TCSI Code 01-XX) to LSP
6. LSP provisions switch with new PIC translation
7. LSP notifies NTP work completed. (TCSI Code 20-XX)
8. NTP confirms PIC change to IXC (TCSI Code 20-XX)
9. NTP notifies old IXC of OutPIC. (TCSI Code 22-XX)

Frozen PIC Scenario
Existing End User Changes IXC



IXC-NTP-LSP Data Flows:

1: Customer calls IXC requesting IXC's service
2: IXC accesses NTP Freeze database, customer determined to be PIC-frozen
3: Call hot transferred to NTP
4. NTP confirms Customer Secure PIN and customer authorizes IXC service change
5: IXC sends PIC request (TCSI Code 01-XX) to NTP.
6: NTP sends request (TCSI 01-XX) to LSP, and updates PIC Freeze database
7: LSP provisions switch.
8: LSP notifies NTP work completed. (TCSI Code 20-XX)
9: NTP notifies IXC PIC confirmed. (TCSI Code 20-XX)
10: NTP notifies old IXC of OutPIC. (TCSI Code 22-XX