

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington D.C. 20554**

In the Matter of:)
)
Implementation of the)
Local Competition Provisions) **CC Docket No. 96-98**
Of the Telecommunications Act of 1996)
)

**COMMENTS OF TARGUS INFORMATION CORPORATION
IN RESPONSE TO
PETITIONS FOR RECONSIDERATION**

Executive Summary

TARGUS Information Corporation is a privately held company based in Vienna, Virginia and considers itself an Independent Database Aggregator (IDA). TARGUS provides real-time intelligence regarding telephone numbers in order to facilitate consumer-to-consumer and consumer-to-business transactions.

One of our service applications is CallerName Express, a CNAM application sold to LECs, CLECs, Internet Telephony Providers and others for the purpose of allowing Caller Name display to occur if the calling party does not block it. TARGUS provisions this service for use by telephony service providers primarily by compiling North American consumer, business and government listings into a common aggregated database.

The purpose of this filing is to summarize our position on three points:

- Independent Database Aggregators such as TARGUS play an increasingly important role in the telecommunications industry by providing common, ubiquitous service to all common carriers. Because IDAs act as responsible agents for carriers, these third-party providers should have the same rights and privileges of CLECs in gaining access to ILEC CNAM databases. Current market conditions allow us to do so.
- Contrary to comments filed by other petitioners, quality of service offered by an Independent Database Aggregator can be substantially better for CNAM consumers. In order to meet quality expectations, however, CNAM and other call-related databases must be made available to Independent Database Aggregators, either in bulk or real-time access, from all carriers including CLECs and other telephony service providers.
- Since third party providers such as Independent Database Aggregators are flourishing, it is not necessary for the FCC to set TELRIC rates for CNAM and other call-related database services.

Independent Database Aggregators

With the onset of local competition, many problems have evolved in the industry regarding universal real-time access to call-related databases such as CNAM. Problems, such as the loss of geographic significance of telephone numbers and the NPA/NXX of working telephone numbers no longer being ILEC specific, have resulted in the current Common Channeling Signaling network becoming increasingly ineffective in accurately identifying the appropriate call-related database belonging to service providers.

The role of the Independent Database Aggregator has been to work through these issues with the various carriers to compile or have access to the numerous call-related databases in the industry. As competition continues to grow, IDAs becoming increasingly important for several other reasons:

- New carriers may not want to standardize on the SS7 protocol to access call-related databases. Currently, ILEC networks only allow SS7 access into their CNAM and call-related databases.
- IDAs can provide consistent rules for display of CNAM.
- IDAs can house listings from CLECs and other telephony service providers that cannot afford to provision SS7 databases in their network.
- IDAs will foster competition by driving down the market price for CNAM as well as offering a common “utility” service to all common carriers.
- IDAs will aggregate data from other countries outside of the United States allowing for international CNAM service.

To date, ILECs have recognized the role of Independent Database Aggregators such as TARGUS and have either entered into data exchange agreements or have allowed us access into their call-related databases.

Data Quality

The quality of our aggregated database is core to our business. The TARGUS CNAM database contains residential, business and government listings and has some level of information on all telephone numbers. Of these numbers, over 130 million contain name information used in the CNAM application. Other information includes type of phone, such as cellular or pay phone. If specific name or phone type information is not available, city and state information is displayed.

The database is aggregated from multiple sources. Approximately 95% of the database originates from or is verified by telecommunication sources. Other verification sources include our customers and partners in the call center, retail and finance industries, as well as publicly available government sources.

TARGUS CNAM data is stored on a mated pair of industry-standard and independently-certified SCPs, accessible via SS7 and IP networks. Updates are performed nightly and are automatically downloaded to the TARGUS mated-pair SCPs. An on-line update facility is also available for urgent changes. Each month, approximately 300 million transactions are run against the TARGUS master database for verification purposes.

In April of 1999, The Paisley Group Ltd. of Denver, CO performed an independent, comprehensive audit of TARGUS' CallerName Express service. A statistically significantly sample size of 800 was selected. For this audit a 95% confidence level was used. The margin of error was 1.18% for overall accuracy and 2.72% for name accuracy. Overall accuracy of the database was established to be 97%.

In order to further improve our service, TARGUS has since implemented a CNAM feature that allows for “secondary searches.” This capability gives TARGUS the ability to launch a secondary query to other CNAM databases via the Common Channel Signaling network (SS7) to the ILECs in the event that a search of TARGUS data does not determine the caller's name. If the secondary search results in a name response, it will be provided and displayed in lieu of locality information. This capability, along with our national database, allows TARGUS to have the most comprehensive CNAM service in the industry.

We strongly believe this secondary search capability is essential for an Independent Database Aggregator. IDAs also need the ability to gain batch or real-time access to call-related databases offered by CLECs and other telephony service providers. It would be anti-competitive and not in the best interest of the industry for any carrier or their representatives to prevent IDAs from gaining this access.

Pricing

Our low cost structure allows us to offer per-transaction or flat rate CNAM pricing that is substantially below rates currently being offered by the ILECs. Since secondary searches constitute a low percentage of the total CNAM transactions we service, our low cost structure can be maintained.

Conclusion

CNAM service as offered by TARGUS is a high quality, competitively priced and independent alternative to the ILEC legacy service. Third party providers such as IDAs are able to offer a level of service that is at least comparable to that offered by the ILECs. For this reason, and because there is evidence that market rates for CNAM are falling due to competitive pressures, the Commission should not be required to set TELRIC rates for CNAM and other call-related services.