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EX PARTE

August 22, 2000

Ms. Magalie Roman Salas
Secretary - Federal Communications Commission
The Portals, 445 Twelfth St., SW
Washington, D.C., 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

RE: CC Docket No. 99-200

Dear Ms. Salas,

Yesterday, Jim Sichter, Hoke Knox, and I, representing Sprint, met with representatives of the Network Services Division and the Competitive Pricing Division of the Commission's Common Carrier Bureau regarding the above referenced matter. Representing the Bureau were Sanford Williams, Aaron Goldberger, Ana Janckson-Curtis, Diane Harmon, and Cheryl Callahan. In this meeting we discussed the cost recovery for thousands block number pooling. The attached materials were used in the meeting and formed the basis of the discussions.

In accordance with FCC rules, I am filing the original and one copy of this letter in the docket identified above. If there are any questions, please call.

Sincerely,



Pete Sywenki

cc: Cheryl Callahan
Ana Janckson-Curtis
Aaron Goldberger
Diane Harmon
Sanford Williams

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NUMBER POOLING

COST RECOVERY

August 21, 2000



Number Pooling Cost Recovery

- Number Pooling Cost Recovery Should Be National In Scope
 - All service providers benefit with number resources
 - Number pooling helps delay NANP exhaust
- Number Pooling Cost Allocation Should Follow the Local Number Portability (LNP) Process
- All State Number Pooling Cost Recovery Should Roll Into the National Number Pooling Cost Recovery

Drivers - Number Pooling Trials

- Potential States with FCC Authority to Implement Number Pooling Trials or with Pending Request That Impact Sprint's Local Division.
 - North Carolina, Indiana, Missouri, Nebraska, Ohio, Oregon, Pennsylvania, Tennessee, Virginia, Washington, Texas, Florida, New Jersey, and Minnesota ?
 - 13 of 18 states
 - Number pooling trials - Texas & Florida
 - Number pooling database stores all pooled numbers
- National Number Pooling

National NP Costs

- NPAC Statements of Work (SOW)
 - SOW 4 NPAC release 1.4 number pooling
 - SOW 15 NPAC release 3.0 number pooling
- National Pooling Administrator Costs
 - Unknown?
- Cost Allocation
 - Based on end user revenues
 - All service providers nationwide - CMRS, IXC, LEC, & CLEC

Major Categories for Cost Recovery

- Operational Support Systems (OSS)
 - Telephone Number Inventory and Assignment (CODARS)
 - » Modify systems from NXX to NXX-X
 - » Create 1K block utilization reports for the pooling administrator (PA)
 - » Receipt and donation of 1K blocks from PA
 - » Identification of contaminated numbers for block donation
 - Customer Information Datastore (CIDS)
 - » Addition of pooling indicator to ensure that number pooled accounts are removed from the ported data and not returned in the snapback process during disconnect.
 - Customer Record and Billing (CRB)
 - » Modify customer records for accuracy of assignment numbers for number pooling block analysis.



Major Categories for Cost Recovery

- Operational Support Systems (OSS) (con't)
 - Integrated Request Entry System (IRES)
 - » Telephone number assignment for CLEC customers
 - » Provide the ability to accurately manage the donatable and assignable inventory of numbers through a comprehensive number assignment process.
 - » Assign numbers from highly contaminated blocks first to allow sufficient blocks for pooling administrator.
 - Message Processing System (MPS)
 - » Modify system from NPA-NXX to NPA-NXX-X

Major Categories for Cost Recovery

- Operational Support Systems (OSS) (con't)
 - Service Order Entry (SOE)
 - » Telephone number validation for service order activity.
 - » Provide the ability to accurately manage the donatable and assignable inventory of numbers through a comprehensive number assignment process.
 - » Assign numbers from highly contaminated blocks first to allow sufficient blocks for pooling administrator.
 - » Modify systems to ensure that number pooled accounts are removed from the ported data and not returned in the snapback process during disconnect.
 - » Automate the generation of orders for contaminated telephone numbers with 1K blocks for donation to the pooling administrator.

Major Categories for Cost Recovery

- Operational Support Systems (OSS) (con't)
 - Service Provider Look-Up (SPLU)
 - » Modify system to provide the ability to determine the service provider for a 1K block for Service Assurance.
 - Switch Audit Process (SWAP)
 - » Automate audit of telephone numbers in switch to number inventory systems to ensure accuracy for donation of clean and contaminated blocks for the pooling administrator.

Major Categories for Cost Recovery

- Operations

- Number inventory audit (manual process initially) for donation of clean and contaminated blocks for the Pooling Administrator.
- Pooling Administrator report production.
- Contaminated number porting.
- Training.

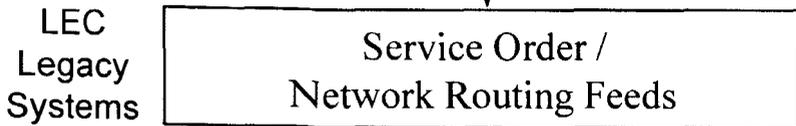
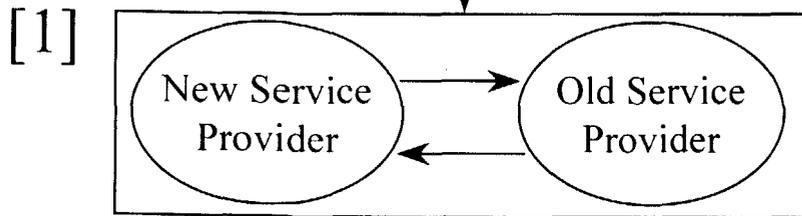
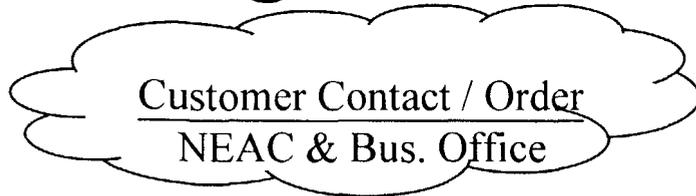
Major Categories for Cost Recovery

- Network
 - NPAP (Number Portability & Provisioning System)
 - » Local SMS upgrade to support number pooling with EDR.
 - SS7 Components
 - » Additional SCP hardware & maintenance
 - » SCP software to support number pooling.
 - SCP - Efficient data representation (EDR) upgrade.
 - » SCP link additions for number pooling.
 - Upgrade Existing Switching Systems for Number Pooling.

Number Pooling Surcharge

- End User Surcharge
 - Monthly, Explicit
 - Applied for 3 Years Beginning 2/1/01
 - Service Provider Specific Based on Its Own Cost
- Estimated End User Surcharge @ \$.14 -\$.17 per month
 - Using LNP cost recovery model
 - “But for number pooling” rule
 - Calculation based on 3 years beginning 2/1/2001 and ending 1/31/2004.

NP Network Diagram



NEAC -- National Exchange Access Center
 LTD -- Local Telecommunications Division
 NPAC -- Number Portability Administration Center
 NPAP -- Number Portability Administration & Provisioning System
 SCP -- Service Control Point
 SMS -- Service Management System
 SOA -- Service Order Administration
 STP -- Signal Transfer Point

