CTIA

Cellular Telecommunications Industry Association

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

October 18, 2000

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Ms. Magalie Roman Salas
Office of the Secretary
Federal Communications Commission
The Portals
445 Twelfth Street, SW
12th Street Lobby, TW-A325
Washington, DC 20554

**Re: *Ex Parte* Presentation**
**CC Docket No. 95-116 Number Portability**
**CC Docket No. 99-200, Number Resource Optimization**

Dear Ms. Salas:

On October 17, 2000, the Cellular Telecommunications Industry Association ("CTIA") represented by Lolita Smith, Staff Counsel, and other industry representatives met with the Federal Communications Commission staff listed below.

The purpose of the meeting was to provide a tutorial regarding the technical issues associated with numbering and local number portability. The presentation is attached hereto.

**Commission Staff in Attendance**

Karen Franklin
Kris Monteith
Jennifer Salhus
Janet Sievert
Joe Levin
Patrick Forster

**Industry Representatives In Attendance**

Ben Almond, Cingular Wireless
Colleen Flury, AT&T Wireless Services
Anna Miller, Cingular Wireless
Andrea Cooper, Verizon Wireless
Anne Cummins, AT&T Wireless

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Pursuant to Section 1.1206 of the commission's Rules, an original and one copy of this letter is being filed with your office. If you have any questions concerning this submission, please contact the undersigned.

Sincerely,

Dustun L. Ashton
Paralegal

CTIA

# Wireless Bureau Tutorial

Numbering

Local Number Portability

Cellular Telecommunications Industry Association

October 17, 2000

# I. Wireless Basics

Safety-
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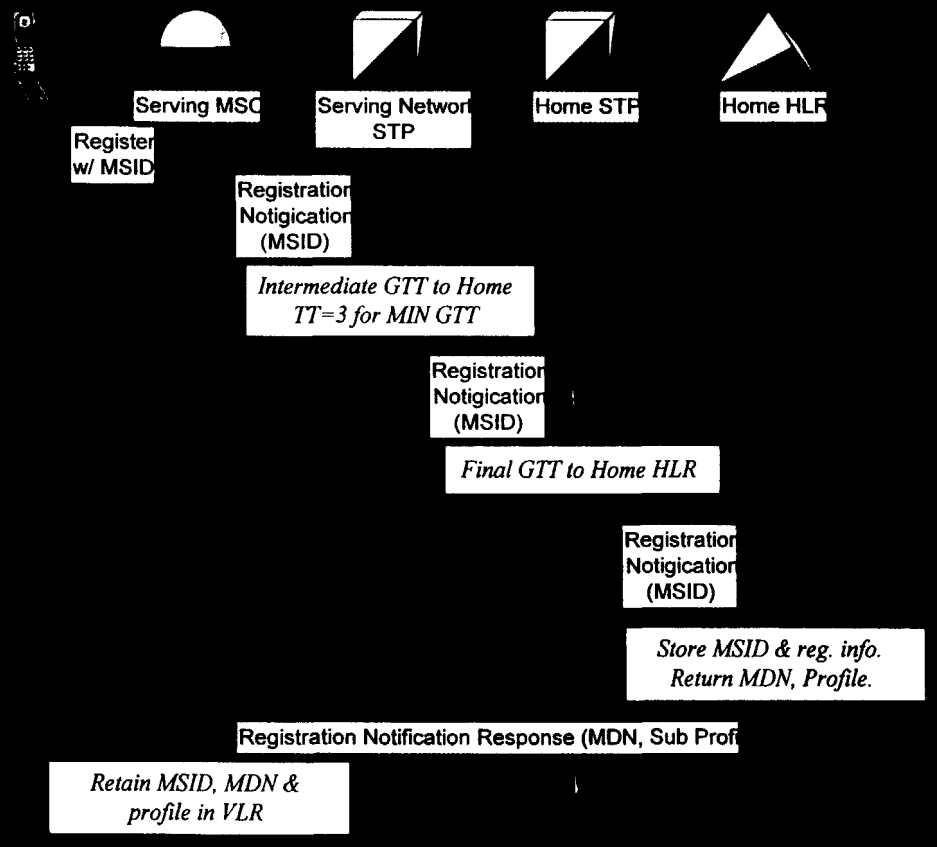
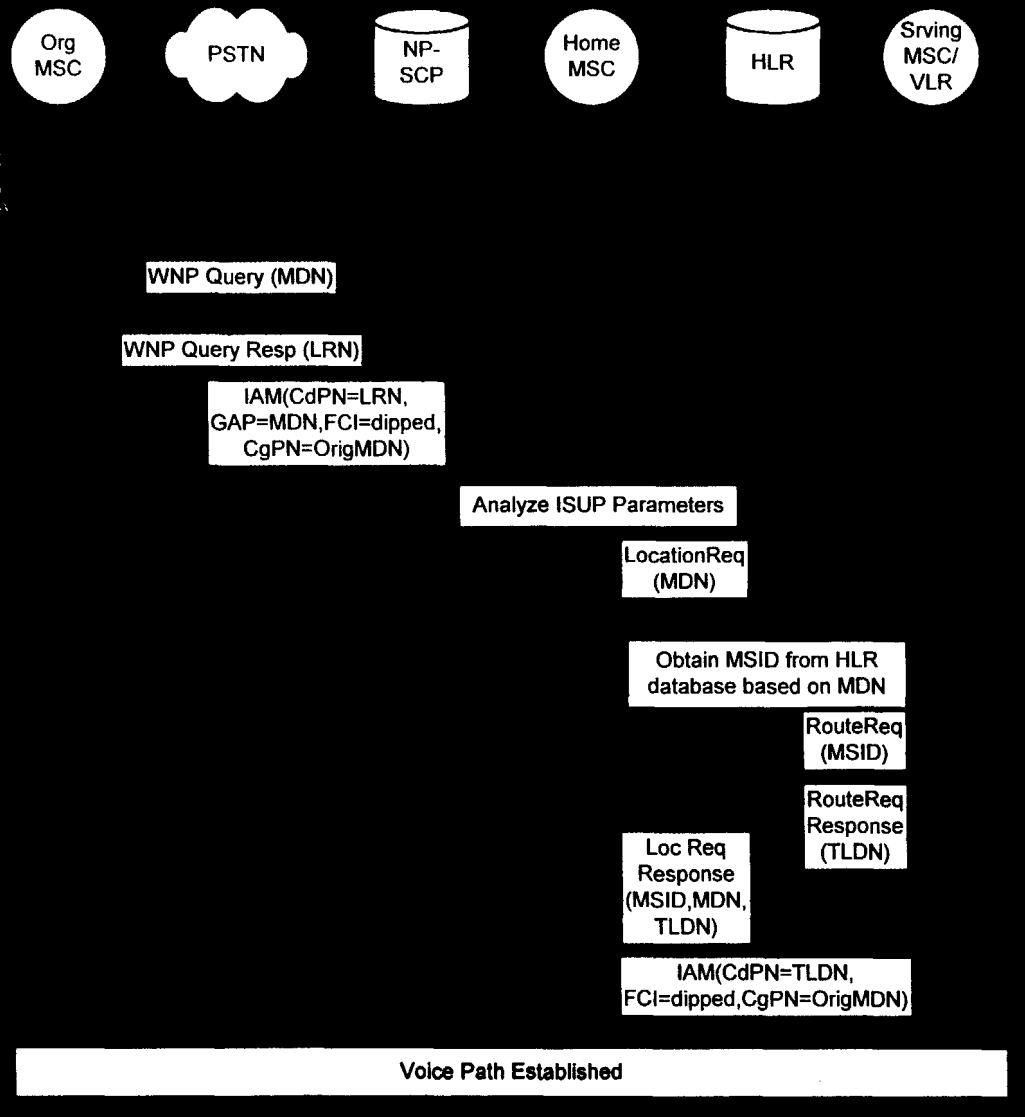
important call


Serving MSC
Serving Network STP
Home STP
Home HLR
Register w/ MSID
Registration Notigication (MSID)
Intermediate GTT to Home TT=3 for MIN GTT
Registration Notigication (MSID)
Final GTT to Home HLR
Registration Notigication (MSID)
Store MSID & reg. info. Return MDN, Profile.
Registration Notification Response (MDN, Sub Prof
Retain MSID, MDN & profile in VLR

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# Wireless vs. Wireline Difference

- Wireline uses one NXX per rate center
- Wireless uses one NXX over several rate centers
- Wireless NXX rate center selection and assignment

# II. Critical Issues

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# Relationship With States

- Wireless Carriers primarily regulated by the FCC, not States
- FCC plenary jurisdiction over numbering
- FCC delegated authority to States
  - Initially, NPA Relief Planning
  - Additional delegation for number pooling trials, code reclamation, code conservation, modification to lottery/rationing process

# Relationship With States

- NPA relief is becoming politically unpopular
- States are invoking stringent number conservation methods in different ways
- Wireless carriers not able to get numbers
  - Necessitates filing emergency petitions

# Relationship With States

- As national carriers, wireless providers need national numbering guidelines
- Consistency is critical, states should not be allowed to depart from national guidelines
- Multiple state approaches to numbering creates confusion and inconsistency

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# III. Conservation Solutions

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# Code Conservation Measures

- Wireless Proposals
  - Utilization (Fill) Rates
  - Codes Assignment Procedures
- FCC Proposed Solutions
  - Thousands Block Number Pooling
  - Unassigned Number Porting (UNP)
  - Individual Telephone Number Pooling (ITN)
  - Rate Center Consolidation (RCC)

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# Utilization (Fill) Rates

- FCC is considering adoption of utilization (fill) rates
- An appropriate utilization rate is difficult to determine
- Wireless SPs support the adoption of a reasonable utilization (fill) rate
  - If set too high or does not allow for seasonal fluctuation b/c it would undermine the ability of wireless carriers to service their customers.
  - Recently filed NRUF data should provide a factual basis for the FCC to determine a permanent utilization rate that will promote conservation

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# Code Assignment Procedures

- Normal Code Assignment Process
  - Six months before LERG effective date
- Jeopardy Code Assignment Process
  - Six months before LERG effective date
  - Enter lottery
- Proposed National Imminent Exhaust Code Assignment Process
  - Three months to exhaust
  - Immediate code assignment

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# FCC Proposed Solutions

- Pooling
  - For LNP capable carriers
  - Wireless carriers support pooling once LNP capable
- UNP and ITN
  - Under study at INC
- RCC
  - Wireless carriers support RCC
  - RCC will complement the number conservation effects of pooling
  - Issues:*
    - Wireline E911 routing &
    - Loss of LEC intra-LATA toll revenue

*Note: Texas and Georgia have been able to overcome

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# IV. Local Number Portability Overview

# WIRELESS NUMBER PORTABILITY MAJOR IMPACT

## *Roaming & the MIN/MDN Separation*

### NATIONWIDE ROAMING

**WNP impacts virtually all wireless service providers**, inside and outside the top 100 MSAs. Even non-porting service providers outside the the top 100 MSAs must separate the MIN and the MDN to support roaming for porting service providers inside the top 100 MSAs

For WNP, the telephone number or MDN must be separate from the routing address or MSID (an IMSI or MIN). **All MIN based service providers who roam must do the MIN/MDN Separation for WNP.**

### NON-PORTING

- Network
  - All MSCs that support roamers, inside and outside the 100 MSAs, must deploy and activate LNP software to receive and process both the MDN and MIN
- Billing
  - Implement MIN (not MDN) based roaming tables
  - Support CIBER X2 or TAP3 billing to record necessary additional Call Detail Record (CDR) fields

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