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July 23, 2003

Ms Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: CC Docket No. 95-116

Dear Ms Dortch:

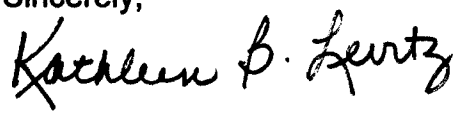
This is to inform you that on July 22, 2003, Bill Stacy, Bill Shaughnessy, Ron Steen, and I, representing BellSouth, met with William Maher, Carol Mattey, Narda Jones, Robert Tanner, Eric Einhorn, Cheryl Callahan, and Pamela Slipakoff of the Wireline Competition Bureau and Jared Carlson, Jennifer Salhus and Patrick Forster of the Wireless Telecommunications Bureau. The purpose of the meeting was to discuss the technical issues posed by the requirement that BellSouth port telephone numbers in any one of the following three situations:

1. The number to be ported is associated with a customer of a wireless carrier with Type 1 interconnection to BellSouth's network and the wireless carrier requesting the port also has Type 1 interconnection to the BellSouth network;
2. The number to be ported is that of a BellSouth wireline customer and the wireless carrier requesting the port has Type 1 interconnection to the BellSouth network; or,
3. The number to be ported is associated with a customer of a wireless carrier with Type 1 interconnection to BellSouth's network and BellSouth is requesting the port.

The attached document fully captures the content of the BellSouth presentation at the meeting.

In accordance with Section 1.1206, I am filing this notice electronically and request that you please place it in the record of the proceeding identified above. Thank you.

Sincerely,



Kathleen B. Levitz

Attachment

cc: William Maher
Carol Mattey
Narda Jones
Robert Tanner
Eric Einhorn
Cheryl Callahan
Pamela Slipakoff
Jared Carlson
Jennifer Salhus
Patrick Forster

Wireless Number Portability
Type 1 Portability Issues

July 22, 2003

Purpose

- Update on BellSouth's progress in preparing for Wireless LNP
- Update on issues related to type 1 trunking discussed in our April 30, 2003 meeting.

Why is BellSouth involved in WLNP at all?

The Telecommunications Act of 1996 (FCC Docket 95-116) mandates service provider number portability for ILECs, CLECs and Wireless Carriers

- Wireline to Wireless
  - BellSouth receives a Local Service Request (LSR) to port out a BST or CLEC Resale wireline number to a wireless carrier
- Wireless to Wireline
  - Bellsouth receives a request to port in a wireless customer as a BST wireline number or CLEC resale wireline number
- Wireless to Wireless
  - BellSouth's LNP Gateway will receive and acknowledge broadcast messages for every wireless to wireless port completed, and will update the Location Routing Number in BellSouth's SMS.
  - When the wireless numbers involved reside in a BellSouth switch (Type 1), BellSouth must change software translations in the switch.

What are the different types of interconnections between BellSouth and the wireless carriers?

- <u>Type 2</u>

  Type 2 interconnection is a trunk connection between the wireless carrier switch and a BST access tandem switch (Type 2A) or BST end office switch (Type 2B) which supports traffic between the wireless carrier switch and the PSTN. Type 2 wireless numbers reside in the wireless carrier switch. All traffic associated with Type 2 wireless numbers routes to/from the wireless carrier switch via either type 2A or type 2B trunk groups.

  NPA NXXs associated with Type 2 interconnection are assigned to the wireless carrier. Accordingly, the wireless carrier is shown as the code holder in the LERG.

- <u>Porting of Type 2 Numbers</u>

  Porting of type 2 wireless numbers will occur in a manner similar to wireline CLEC ports. BST involvement in type 2 porting will occur only when (1) BST receives an LSR to port a BST or CLEC Resale wireline number to a wireless carrier; or, when (2) a wireless customer request is received to port in as a BST wireline number or CLEC Resale wireline number.

What are the different types of interconnections between BellSouth and the wireless carriers

- **Type1**
- Type 1 interconnection is a trunk connection between the wireless carrier switch and a BST end office switch which supports traffic between the wireless carrier switch and the PSTN. Type 1 wireless numbers reside in the BST end office and are assigned to the Type 1 trunk group. All traffic terminating to Type 1 wireless numbers routes to the BST Type 1 interconnection end office. Calls are then routed over the Type 1 trunk group in a fashion similar to DID calls. Type 1 numbers are not necessarily assigned at the NXX level, but are assigned to the wireless carrier via BST tariff at the number block level, e.g. 100s or 1000s blocks.

- The NPA NXX associated with the Type 1 interconnection is assigned to BST and not the wireless carrier using the Type 1 interconnection (with the exception of dedicated type 1). Accordingly, BST is shown as the code holder in the LERG. When a wireless Type 1 customer elects to port, both BST and the donor wireless carrier are involved.

What are the different types of interconnections between BellSouth and the wireless carriers

- **Porting of Type 1 Numbers:**

- A request to port a Type 1 wireless number from one wireless carrier to another will trigger an LSR from the recipient wireless carrier to BST requesting a port out of the type 1 wireless number. Porting of Type 1 numbers will follow a process similar to wireline porting of reseller numbers in that a loss notification will be provided to the donor wireless carrier.
- Wireless carriers may request that the BST NXX associated with Type numbers be made eligible for porting. Wireless carriers may then request a project-managed port out of their Type 1 numbers to their wireless switch.
- Porting of a Type 1 wireless number requires that a disconnect service order be issued against the Type 1 number block in the BST end office This type of disconnect will involve a complex order. Complex orders currently do not flow through the LNP Gateway but will initially fall out for manual handling by a service representative This process is referred to as "Partially Mechanized". Full mechanization will be provided to allow this type of complex service order to flow through without manual assistance in a 2Q2004 software release.

What are the different types of porting activity, our forecast and what has BellSouth done to prepare for this?

- Type 2
  - Wireless to Wireless 4.1M/yr Fully Mechanized
  - Wireline to Wireless 21K/yr Fully Mechanized
  - Wireless to Wireline 6K/yr Fully Mechanized

- Type 1
  - Port-out to Type 2 14,022/yr Partially Mechanized *
  - Port-in 697/yr Partially Mechanized
  - Port-across 174/yr Manual

* Full mechanization scheduled 2Q04

What are the technical issues with the Port Across scenarios?

- All of the processes and procedures BellSouth developed to support Wireline LNP were based on porting numbers between two service providers who have *different* networks.
- In the wireline LNP process, and in all the "port out" or "port in" WLNP processes, the ported number is disconnected on the BellSouth switch and ported to a CLEC switch (or vice versa).
- BellSouth's Operation Support Systems do not support the process of disconnecting and reconnecting a ported number in the *same* network.

What alternative solutions for Type 1 - Port Across has BellSouth considered?

- Significant modification of existing legacy OSS
- Remote Call Forwarding
- Implementing switch and SMS changes only without OSS record changes
- Establishing Type 2 groups for each wireless carrier
- Porting the number temporarily out to another carrier's network and then porting it back to the BellSouth network.

Each of these proposed alternatives has some drawbacks.

What are the major drawbacks for the alternative solutions?

- OSS modifications
  - Significant time to implement and coordinate with existing CLEC commitments. The long term solution, which involves modification of over 18 of BellSouth's OSS, is in planning for an August, 2004 software release.

- Remote Call Forwarding
  - Customer has a second telephone number assigned to the wireless phone
  - Performance (call set-up) is slightly degraded

- Implementing switch and SMS changes only without OSS record changes
  - E911 records require manual update and maintenance Maintenance records require manual intervention
  - Customer billing records require manual interventions
  - No audit trail (service order) for customer activity

What are the major drawbacks for the alternative solutions?

- Establishing Type 2 groups for each wireless carrier
  - Small carrier switches may not support Type 2 interconnection
  - Type 2 (tandem interconnection) may create rate center issues vs. type 1

- "Port-out/Port-In"
  - Requires manual coordination between BLS and a cooperating carrier
  - Due to the NPAC timers technical limitations, porting outage time may be several hours.

What will BST do in the interim until the OSS modifications can be implemented?

First alternative - Use Remote Call Forwarding to provide number portability for the limited number of end users in this category

Second alternative — Use the "port-out / port-in" process to provide this capability