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ATTORNEYS AT LAW

September 24, 2004

EX PARTE – Via Electronic Filing

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: *Level 3 Petition for Forbearance*, WC Docket No. 03-266;
IP-Enabled Services, WC Docket No. 04-36

Dear Ms. Dortch:

On behalf of Level 3 Communications LLC (“Level 3”), Ms. Cindy Schonhaut, Mr. Rogier DuCloo, both of Level 3, and I met on September 23, 2004, with Tamara Preiss, Chief of the Pricing Policy Division; Jennifer McKee, Assistant Chief of the Pricing Policy Division; as well as Terri Natoli and Julie Saulnier of the Wireline Competition Bureau. We provided each with a copy of the attached document, which summarizes the presentation.

In accordance with the Commission’s rules, I am filing this letter electronically in the docket identified above.

Sincerely,

/s/

John T. Nakahata

Enc.

Proposed Methods for Identification of IP Enabled Services

Originating Line Information Background and Uses

- Originating Line Information (OLI) also known as ANI II is a SS7 ISUP call set-up parameter embedded in the Initial Address Message (IAM)
 - ISUP (ISDN User Part) defines the SS7 protocol used to set-up, manage, and release trunk circuits that carry voice and data between terminating *circuit* switches (e.g., between a calling party and a called party)

- Sample:

```
-----  
Octet040 ISUP Originating line information parameter  
-----  
11101010 Parameter name code ISUP Originating line information parameter  
00000001 Parameter length I  
00000000 Orig line info Binary equivalent of the II digits (administered by BellCore)  
-----
```

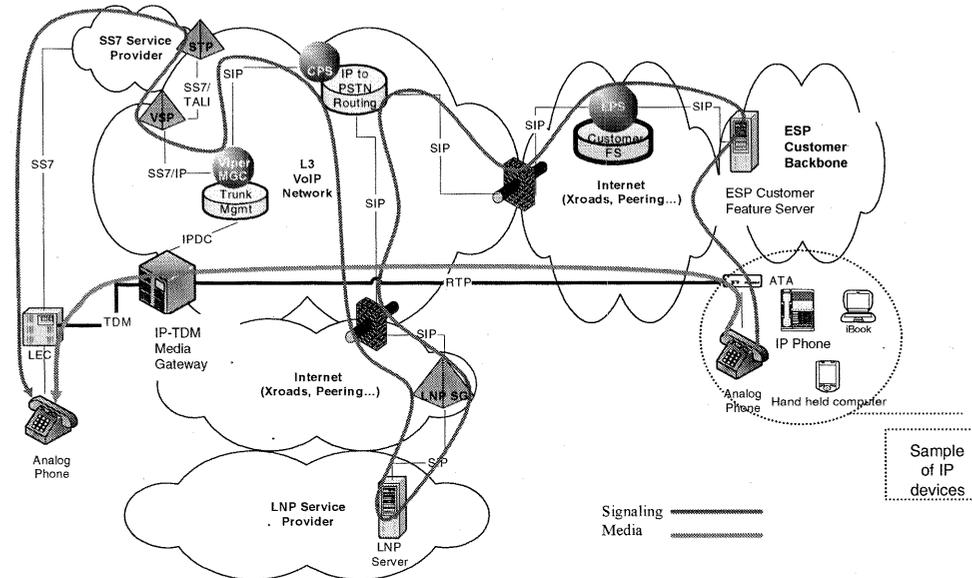
- OLI has been deployed by the ILECs since 1998 as a result of the FCC order requiring LECs to transmit payphone-specific coding digits to identify such calls for payphone or dial-around compensation
- IXCs use the OLI Parameter to identify calls originating from payphones for compensation to PSPs for non-coin calls
- OLI transmits a two-digit number pair that identifies the type of phone line a call is placed from
 - For example, if a call was made from a residential POTS line the ANI II pair would be "00". If a call was made from a payphone it would be "27" or "70" depending on the type of payphone (dumb or smart)
- Expanded use of OLI/ANI II digits will continue to support service offerings and system capabilities

Originating Line Information

Used to identify IP Enabled Services Traffic

- While this method was implemented initially in the context of reversed billed payphone calls, the methods could also be used in other applications where it's necessary to distinguish a particular type of originating line from other types of originating line
- Level 3 recognizes that in a multi-carrier environment, the other carrier is unable to identify whether traffic is IP-originated or terminated traffic on Level 3's network
- Level 3 proposes to use the OLI parameter to identify IP-originated traffic by setting the OLI digits to a to be agreed on value
 - The currently unassigned values of 64 or 65 are suggested
- The other carrier's *circuit* switch could be programmed to capture this value for billing purposes "real-time", or this method can be used to synch billing records at the end of the billing cycle, or could become very valuable in case of a dispute or other reason that would require an audit of the call detail data
 - In such case the agreed upon OLI value will help identify which calls were originated from an IP enabled device
- Because OLI is a SS7 ISUP call setup parameter, traffic that is TDM-originated on the other carrier's network and IP-terminated on Level 3's network would not be able to be identified using this method

IP Enabled Services Call Flow



- Call originates from a phone connected to an Analog Terminal Adapter (ATA), from a PC with a SIP Soft Client, or from an IP Phone
- Call is sent through a broadband connection to a service providers Feature Server (FS)
- The FS hands the call to the Level 3 Network at a Level 3 Edge Proxy Server (EPS)
 - The EPS is provisioned specific to a customer, so it authenticates the calls came from a specific customer
 - EPS is configured that all calls coming from that customer's FS will be classified as IP-originated in the SIP Invite with a Level 3 proprietary header
- EPS sends call to Core Proxy Server (CPS)
 - CPS is the network routing engine that determines how to terminate the call
 - For this case, CPS sees the IP-origination classification, so it will try to find a DEOT to which it can terminate the Dialed Number.
 - CPS will trigger out to do an LNP dip on any call that could terminate over DEOT
 - CPS will use either the LRN or the terminating NPA-NXX to find the correct DEOT
- CPS sends call to Media Gateway Controller (MGC)
 - MGC converts SIP to ISUP
 - MGC sees IP-origination classification and sets OLI to a configurable value (64 or 65 are the values being proposed)
- MGC sends call to LEC