

10 February 2005

Ms. Marlene H. Dortch, Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, S.W. Room TW-A325  
Washington DC 20554

Re: ***Ex Parte* Presentation**

In the Matter of Number Resource Utilization, Docket No. 99-200

In the Matter of IP-Enabled Services, Docket No. 04-36

In the Matter of Telephone Number Portability, Docket No. 95-116

Dear Ms. Dortch:

This is to inform you that Adam C. Newman (Sr. Engineer, Telcordia Technologies, Inc), Anthony M. Rutkowski (Vice President of Regulatory Affairs, VeriSign, Inc.), Margaret M. Lee (Sr. Technical Solutions Manager, VeriSign, Inc. by telephone), and Kelli Gracy (Product Manager, SNET Diversified Group by telephone), met on 9 February 2005 at the Commission's headquarters with Cheryl Callahan, Asst. Div. Chief, Sanford S. Williams, Attorney Advisor, and Pam Slipakoff, Attorney Advisor – all of the Telecommunications Access Policy Div, Wireline Competition Bureau. Douglas Ranalli (Founder and Chief Strategy Officer, NetNumber, Inc.) also participated in drafting the submitted materials and joins in the notice.

The purpose of this meeting was to express concerns regarding attempts by the Number Portability Administration Center (NPAC) contractor to introduce VoIP routing data and functionality to the NPAC which could be used to provide VoIP routing service as part of its support contract. The attached slides formed the basis of dialogue, and convey the substance of what was discussed.

Pursuant to the Commission's rules, this *ex parte* letter together with presentation slides are being filed via the Commission's Electronic Comment Filing System for inclusion in the public record of the above-referenced proceedings.

Respectfully submitted,

/s/

Anthony M. Rutkowski  
Vice President for Regulatory Affairs  
VeriSign Communications Services  
21355 Ridgetop Circle  
Dulles VA 20166-6503  
tel: +1 703.948.4305  
mailto:trutkowski@verisign.com

cc:

Cheryl Callahan  
Sanford S. Williams  
Pam Slipakoff  
Russell Hanser

Adam C. Newman  
Margaret M. Lee  
Kelli Gracy  
Douglas Ranalli

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# NPAC & VoIP Routing Data Concerns

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## Contacts:

A. Newman, Telcordia Technologies

[anewman@telcordia.com](mailto:anewman@telcordia.com)

A.M. Rutkowski, VeriSign

[trutkowski@verisign.com](mailto:trutkowski@verisign.com)

D. Ranalli, NetNumber

[dranalli@netnumber.com](mailto:dranalli@netnumber.com)

February 9, 2005

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# Summary

- The Number Portability Administration Center (NPAC) contractor is attempting to provide a new VoIP routing service as part of its support contract
- This routing service
  - Has no nexus to the purposes of the NPAC under FCC policy and orders
  - Creates potential technical and operational complications in implementing such services
  - Cannot be lawfully implemented without appropriate Commission policy-making action in consultation with the industry and public

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# How the VoIP routing service is being pursued

- The North American Portability Management (NAPM) LLC was asked by its NPAC contractor to add two Change Orders NEU 001 and NEU 002 to the new Statement of Work (SOW) Package.
  - Without going through the FCC approved Change Management process
  - Without prior industry review at Local Number Portability Administration Working Group (LNPA WG) of the North American Numbering Council (NANC)
- The LLC asked the LNPA WG to only review if the change orders would “break” anything if the functionality was left “turned off” at the NPAC, notwithstanding
  - Vendor and service provider objections at LNPA WG
  - LLC initially rejected adding change orders at that time and had the contractor submit to NANC LNPA WG
- NANC 399 and 400 Change Orders submitted by the LLC contractor at January 2005 LNPA meeting
  - All other vendors present raised many concerns

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# What the change orders do

- NANC 399
  - Adds a field identifying a Service Provider Type of “VoIP”
- NANC 400
  - Expands NPAC beyond inter-Service Provider number porting or pooling by adding a Universal Resource Identifier (URI) field for each ported or pooled Telephone Number to NPAC to allow for carrier-to-carrier IP routing
  - Functionality is very similar to that provided within the industry by service providers, and standards bodies for services such as ENUM
- Status
  - Vote scheduled on inclusion of NANC 399 and 400 in the current package at the February LNPA WG meeting
    - without having properly followed normal processes,
    - without industry consensus on the business need,
    - with many outstanding concerns, and
    - without the usual prioritization

# Actions contravene established FCC policy

- Such an expansion appears not to comport procedurally and substantively with Commission rules
- VoIP routing should be left to the competitive commercial marketplace within Commission frameworks (which recognizes the requirements of *Computer III et seq.*)
- Inclusion in NPAC would preempt the role of the NANC and the ongoing proceedings in light of the *SBCIP Order*
- It's worth noting that the order requires VoIP providers meet number portability requirements, among other regulatory requirements
  - Would not be reasonable to have LLC contractor operating its own VoIP signaling service within the very NPAC system that supports number portability or using that system to provision its private signaling service
  - Gives rise to needless potential operational and technical complexities

# LNPA Procedural Concerns

- The industry has just begun its review of these change orders
  - *SBCIP Order* significantly affects industry planning to meet LNP requirements
  - there is no consensus on the business need or change order description
  - important, key questions were raised at the January LNPA Meeting on this text and are yet unanswered
  - any decisions should wait until the industry can review those changes with the correct experts within their companies before proceeding to requirements review
  - requirements as presented have been only briefly reviewed by vendors to confirm that they won't break their systems if added at the NPAC
    - review was cursory and is predicated on the ability to not accept the data (backward compatibility)
- There has been and can be no review to see if the requirements as presented fulfill the business need until that business need is agreed upon
- Several LSMS and SOA vendors have stated they will not be able to support the new fields or data stream in current production systems
  - Renders the added data useless to many SP customers
  - Magnitude of system changes precludes vendors from offering data to clients concurrent with or even shortly following the NPAC release being negotiated
- There is no harm to Service Providers in waiting to make sure that the right decision is being made
  - a delay will help Service Providers and their vendors prepare to make use of appropriate VoIP data regardless of the source
  - expediency at which orders are being pushed does not allow for thorough and complete industry technical or policy discussion

# Changes Not Needed for Portability of VoIP Numbers

- LLC contractor admits\* that these change orders are not required to support the porting of VoIP numbers
- LLC contractor states\* that the URI is like the LRN for VoIP numbers and thus is a natural extension of the NPAC
  - Although also admitting that the information is not needed for the routing of calls to VoIP ported TNs
- LLC contractor suggests the change orders will enhance a SP's ability to route calls to ported numbers via IP rather than the PSTN
  - This is not, however, within the scope and role of NPAC and potentially conflicts with the role of other IP routing solutions
- Enabling these change orders in the NPAC Service Management System (SMS) does not make them 'accessible' to all NPAC users
  - SP interfaces and systems (SOA, LSMS, OSS etc.) require development in order to accept and make use of the data and NPAC data is not used to build translations in switches today
  - There is no need to rush this decision

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\* January 2005 LNPA WG meeting, minutes not yet available, the statements were recorded in participants' notes.

# Alternatives are under development

- LLC contractor asserts that while their proposed service is somehow only "orthogonal" to other industry and standards-based solutions such as ENUM
  - Industry standards based solutions can provide the needed VoIP routing capabilities without enhancements to the NPAC
  - Further industry standards activity involving the ATIS INC are necessary
  - Requisite Commission findings on VoIP routing and directory requirements and implementations are still under consideration in proceedings such as 04-36 (IP-Enabled Services) and 04-295 (CALEA)
  - The ultimate solutions decided will contain TN-URI information
    - Relationship with NPAC needs consideration
    - Independent options are feasible
    - Existence of TN-URI information in LLC contractor will complicate implementing these options
  - May result in discrepancies with any public or private ENUM database should one be developed
  - Caution is appropriate

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# Other Concerns

- Inclusion of eXtensible Markup Language (XML) interface in NANC 400 raises questions as to what systems need this interface and why only for these change orders?

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# Conclusions

- There is no need to add this data to support inter-SP porting or pooling of VoIP numbers
- Even if the enhancement is agreed to and approved by regulatory agencies, SPs systems would not be able to use in the near term; so, there is no need to rush to judgment
- NPAC scope should not be expanded without regulatory proceeding
- NPAC should not be expanded to competitive carrier-to-carrier routing of VoIP calls.