

February 11, 2005

Via ECFS

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

Re: *Notice of ex parte presentation: ET Docket No. 04-35*

Dear Ms. Dortch:

This is to advise you that, on February 10, 2005, David Robinson and Michael Stewart of Syniverse Technologies, Inc. (“Syniverse”) and L. Charles Keller and the undersigned, on behalf of Syniverse, met with Jeffrey Goldthorp, Chief of the Office of Engineering and Technology’s Network Technology Division (“NTD”), Kent Nilsson, Deputy Chief, NTD; John Healy; and Whitey Thayer. In the meeting, Syniverse discussed its pending petitions for reconsideration and partial stay of the Commission’s network outage reporting rules as they affect stand-alone SS7 signaling providers such as Syniverse.¹

In the meeting, Syniverse explained how the new rules require Syniverse to report network events that may not have resulted in any actual disruption to end-user communications, and may lead to inconsistent reporting among providers involved in the same network events. To demonstrate these problems, Syniverse presented details from two recent network events that it was required to report as outages under the new rules. The attached handout describing those events was provided to the attendees. To address these problems, Syniverse urged the Commission to grant its petition for partial stay while it considers these issues, and ultimately to grant its petition for reconsideration.

¹ *New Part 4 of the Commission’s Rules Concerning Disruptions to Communications*, ET Docket No. 04-35, Report & Order, FCC 04-118 Irel. Aug. 19, 2004). *Public Notice*, Petitions for Reconsideration and Clarification of Action in Rulemaking Proceedings, Report No. 2690 (rel. Jan. 31, 2005). Syniverse Technologies, Inc., Petition for Partial Stay, ET Docket No. 04-35 (filed Dec. 27, 2004).

