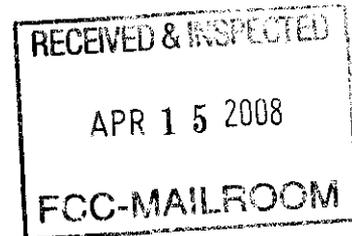




Federal Communications Commission
Office of the Secretary
445 12th Street, S.W.
Washington, DC 20554



RE: Written *Ex Parte* Presentation
CC Docket No. 01-92
Developing a Unified Intercarrier Compensation Regime

Dear Ms. Dortch:

Tekno Telecom LLC (a subsidiary of Tekno Industries, Inc.) is writing to express support for the Petition for Interim Order filed by the National Exchange Carrier Association (NECA) on January 22, 2008.

The petition requests that the Commission extend its existing call signaling rules to all interconnected voice service providers and to all types of voice traffic terminating on the public switched telephone network (PSTN), regardless of jurisdiction or the technology used. NECA's petition also requests that the Commission clarify the definition of what constitutes a valid calling party number (CPN) and that carriers may use telephone numbers as default proxies to determine jurisdiction for billing purposes when mutually agreed traffic factors or information on the actual geographic end-points of calls are unavailable. Tekno Telecom LLC supports adoption of the proposed Interim Order to begin addressing the inter-carrier billing problems faced by rural ILECs.

Tekno Telecom is a manufacturer of SS7 probes that monitor and collect signaling information on public switched telephone PSTN and IP networks. Tekno Telecom started in 1968 in the telecom sector and has implemented over 10,000 systems worldwide, including systems deployed by over 200 U.S. rural ILEC's. Tekno Telecom customers use SS7 information to perform various network operations and engineering studies and to analyze inter-carrier billing issues.

In the past several years, Tekno Telecom's rural ILEC customers have witnessed an increase in call detail records where key information necessary for inter-carrier billing is missing including of particular importance the CPN (calling party number). Consequently, the most recent use of Tekno Telecom's SS7 probe technology has been the collection of SS7 signaling data to supplement information on switch billing records or reconstruct valid switch billing records that were missing. Telecom industry estimates of the magnitude of this problem range from 5% to 50% of total annual carrier revenues depending on the specific carrier and the attending carrier partners. Preliminary results from our rural ILEC customers' SS7 probe

monitoring efforts have produced evidence to confirm these industry total revenue loss estimates.

The CPN of the actual end-user is a critical data point for identifying, properly jurisdictionalizing, and rating the call. Tekno Telecom customers have repeatedly observed that this critical call parameter is absent, modified (all 0000s), or stripped from call records transiting certain carrier tandem and IXC networks. The lack of this information makes the creation of valid billing records problematic and the validation of stripped or damaged CPN information is virtually impossible and therefore most carriers are forced to forego a considerable amount of terminating access revenue.

Missing signaling information is also a result of the fact that wireless carriers typically demand network connectivity using type 2A or 2B circuits in their interconnect agreements with small rural ILECs. These types of connections make it difficult for rural ILECs to obtain sufficient call detail information to positively identify, categorize, and jurisdictionalize the delivered traffic.

In addition, Tekno Telecom's rural ILEC customers are being forced to negotiate interconnection contract language with wireless carriers that states the bulk of the exchanged traffic is local in nature and "not deemed or rated inter-MTA," without any supporting empirical traffic data.

NECA's proposal to adopt a default rule allowing the telephone numbers to be used to establish call jurisdiction for inter-carrier billing purposes in the absence of known actual geographic end points of calls would provide a means to resolve billing disputes between wireless carriers and rural ILECs. Tekno Telecom endorses NECA's proposed telephone numbers rule as a fair and equitable interim industry solution.

Therefore, Tekno Telecom respectfully submits and requests that the Commission issue an Order as petitioned by NECA extending call signaling rules to all interconnected voice service providers and confirming that the CPN must be the valid CPN of the end-user customer in order to facilitate call identification and inter-carrier billing for the growing amount of voice traffic that does not contain appropriate signaling data.

Respectfully submitted,



Ernest C. Karras
President
Tekno Telecom LLC

TEKNO TELECOM, L.L.C.

1250 Shore Road
Naperville, IL 60563