

May 25, 1999

**NANC Response to FCC Rule CC Docket 95-116; FCC 98-275, FR Vol. 63, No. 237,
at Pages 68201-2, Concerning Implementation of 500/900 Service Portability**

I. SUMMARY:

The North American Numbering Council (NANC) has reviewed the matter of 500/900 portability and has concluded that should 500/900 portability be implemented, a structure similar to the toll free systems management facility and data access points could be used. However, the NANC has observed that a strong demand for such a capability does not exist at this time and to design, develop, implement and operate such a system would be costly. The NANC did find that a neutral third party would be needed to manage and operate the centralized database.

Therefore, the NANC recommends the Commission suspend consideration of the issue of implementation of 500/900 portability. If conditions change, NANC will again review the questions in the Commission's Order and advise the Commission of its findings.

II. DISCUSSION:

Service structures for 500, 900, and toll free are different. For example, 900 is always a calling party paid service. Further, both 500 and 900 service structures differ from toll free service structures, as toll free is always called party paid. Such differences require different databases.

The NANC has concluded that a network architecture similar to toll free would be the most appropriate. This would include a national database that would contain a master instruction list to which service providers would upload customer specific information. Routing information would be downloaded from the national database to service provider data access points (DAPs) or service control points (SCPs).

The dialing of a 500 or 900 Service Access Code (SAC) would invoke a call trigger in the originating exchange carrier's network to launch a query to its DAP or SCP to obtain carrier selection information. Upon receipt of that information, the call would be handed off to the appropriate service provider network for completion.

Because the centralized database structure would contain multiple record sets provided by competing carriers, it would have to be managed by a neutral third party. Such a structure has many similar characteristics to the current LNP NPACs.

The current toll free database would not be an appropriate point for housing these records due to capacity requirements, and different service characteristics between toll free and 500/900 services. These considerations compel the construction of separate databases and

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resolution of the associated business and cost recovery issues. Some carriers would also have to deploy separate DAPs or SCPs.

It is expected that following an FCC order, it would take approximately 12 months to develop requirements. After the definition of requirements is complete, we believe it would take approximately 36 months to construct these network elements and condition the existing networks to recognize and route this traffic. This would be a significant investment in new network facilities and service support structures. At this time, there is no indication that there is the degree of demand for 500/900 portability that would justify the expenses that would be incurred in order to build and operate such a capability.

III. NANC RECOMMENDATION:

Accordingly, the NANC recommends that the Commission suspend consideration of the issue of implementation of 500/900 portability. The Industry Numbering Committee (INC) is studying this issue on behalf of the NANC. The NANC will inform the INC that it has concluded this activity unless the Commission directs the NANC to perform additional work in this area.

The specific questions directed to the NANC by the FCC in its Order and NANC's responses follow:

1. Is it technically feasible for all 500 numbers service providers to implement 500 number portability using existing network and administrative database capabilities?

NANC Response: No

2. If the answer to Question #1 is "No", is technology available to develop the appropriate network and administrative database capabilities to deploy 500 number portability in the future?

NANC Response: Yes

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3. If the answer to Question #2 is “YES, how long would it take to develop and deploy the necessary network infrastructure for 500 number portability, upon receipt of a regulatory directive?

NANC Response: 12 months for requirements definition plus 36 months for vendor selection, development, and implementation.

4. Is it technically feasible for all 900 number service providers to implement 900 number portability using existing network and administrative databases capabilities?

NANC Response: NO

5. If the answer to Question #4 is “No,” is technology available to develop the appropriate network and administrative database capabilities to deploy 900 number portability in the future?

NANC Response: YES

6. If the answer to Question #5 is YES, how long would it take to develop and deploy the necessary network infrastructure for 900 number portability, upon receipt of a regulatory directive?

NANC Response: 12 months for requirements definition plus 36 months for vendor selection, development, and implementation.