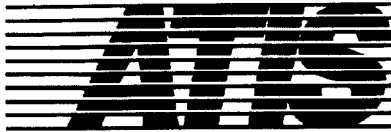


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OBF Reference Number: 00-02-14-1



Alliance for Telecommunications Industry Solutions

Sponsor of the



Ordering and Billing Forum

A forum of the Carrier Liaison Committee

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February 14, 2000

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Mr. L. Charles Keller, Chief  
Network Services Division  
Common Carrier Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, D.C. 20554

Received

FEB 15 2000

Common Carrier Bureau  
Network Services Division  
Office of the Chief

CC DOCKET: 95-155

Dear Mr. Keller:

The purpose of this letter is to provide the Commission with notice of certain issues regarding the performance of the SMS/800 database. As provided for in the Second Report and Order and Further Notice of Proposed Rulemaking in CC Docket No. 95-155 at ¶ 83, (April 4, 1997), the Commission, "anticipate[s] that SNAC will notify the Commission if it determines that there may be degradation in the performance of the SMS database because of the increase in toll free traffic". Accordingly, the SMS/800 Number Administration Committee (SNAC) has determined that the Commission should be notified of existing and potential problems as well as the Committee's work on the associated Issue #1566 titled "SMS/800 System Constraints".

The SNAC has been working with Issue #1566 since August 1997. Since that time, the Issue has been discussed in 14 Ordering and Billing Forum (OBF) SNAC meetings (11 regular and 3 interim), 10 technical sub-team meetings and 3 task force meetings.

The current SMS/800 responsibility structure does not provide for end-to-end accountability for toll free record processing, that is from the point a toll-free customer requests their toll free number to be activated through the successful download to the Service Control Point (SCP) Owner/Operator Switch. There is no single entity to ensure that the need of Toll-Free Customers to have number records updated, through their chosen RespOrgs, is accomplished in a consistently timely manner. The Committee now believes that some fundamental changes are needed in order to be able to meet that need.

SMS/800 is currently administered as two separate and distinct entities, the SMS/800 database and the SCP databases.

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Although there are system measurements in place to capture response times and transaction times within SMS/800, these measurements are not reflective of the total time it takes within SMS/800, these measurements are not reflective of the total time it takes to activate a toll free number for a customer. There are no unified benchmark documents, no end-to-end system demonstrated measurements to ensure quality, and no documented Level of Service Agreements by which to monitor end-to-end system performance. Past performance of the SMS/800 - SCP system has degraded in recent years impacting numerous Toll-Free Service customers and their ability to maintain their toll free service or move to the carrier of their choice in their requested time frame.

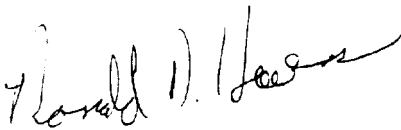
From 800 Number Portability until the beginning of 1997, the SMS/800 operated with few reported incidents of service difficulties. In 1997, RespOrgs began to experience SMS/800 update difficulties. Record update time, which previously had not been of concern, rose to a point where often times, records would get 'stuck' in a bottleneck at the SCP in 'sending' status for periods spanning several hours, and in some instances, for up to three days. System congestion has historically worsened with the increase in NPA Splits, system functionality, record complexity and the number of partitions within the database.

The SNAC has suggested solutions to and requested data from the SMS/800 Management Team (SMT) and the SCP Owner/Operators in order to assist in the preparation of system configuration and processing alternatives. Discussions to date have not yet yielded a comprehensive plan of resolution.

Although SNAC has not yet resolved this issue, we want to inform the FCC of the SMS/800 system degradation and the lack of accountability for end-to-end system performance. The SNAC will continue its work to identify positive steps such as new system measurements, possible interconnection agreements, SMS 800 Tariff changes, and joint meetings of the SNAC Technical Subteam, the SCP Owner/Operators and their vendors and the SMT and its vendors. In conclusion, we are concerned with the extremely slow progress made over the past 2 ½ years. This is due in large part to the fact that as noted in paragraph 3 above, there are many complex regulatory issues outside of the SNAC's control. We will continue to work vigorously towards resolution of those aspects of the issues within our control.

If you have any questions, please do not hesitate to contact me at 913-624-6881 or Megan Campbell, ATIS General Counsel, at 202-434-8847. Thank you for your attention to this matter.

Sincerely,



Ronald D. Havens  
OBF Moderator

Cc: Joan Saucedo, SNAC Co-Chair  
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