February 10, 2006

Electronic Filing
Marlene H. Dortch
Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

      Re: *Ex Parte* Presentation
              CC Docket No. 01-92

Dear Ms. Dortch:

The Alliance for Telecommunications Industry Solutions' (ATIS) Network
Interconnection Interoperability Forum (NIIF) is aware that some parties have made
proposals to the Commission that discuss the Jurisdiction Information Parameter (JIP)
and refer to the ATIS *Rules for Populating JIP* as one part of the solution to the
"phantom traffic" issue currently under review. In addition, various press releases have
been issued discussing the role of JIP in addressing "phantom traffic" issues. The ATIS
NIIF wants to ensure that the Commission understands the intent of the NIIF's *Rules for
Populating JIP* and the appropriate uses of JIP by the industry.

What is JIP? JIP is a six digit parameter in the SS7 ISUP Initial Address Message
(IAM) used to convey information about call origin, as defined in the industry standard
ATIS-PP-1000113.2005, Signalling System No. 7 (SS7) - Integrated Services Digital
Network (ISDN) User Part (Revision of T1.113-2000).

The creation of the *Rules for Populating JIP* (a copy of these rules are attached hereto),
was the outcome of a successful cooperative effort by wireline and wireless industry
participants, and the result of completed work on NIIF Issue #208, *Jurisdiction
Information Parameter*. Significant industry progress was made on this complex issue.
The JIP rules are intended to foster consistency in the telecommunications industry when
signalling JIP in the SS7 network.

The "Rules for Populating JIP" are operational guidelines and assist in the use and
population of the JIP SS7 IAM parameter. The rules provide consistency regarding:

> o   When JIP should be populated (e.g., Rules 1 and 3).
> o   What information is used to populate the data field (e.g., Rules 2, 4, 5 and 6).
> o   What to do when switches cover multiple states/LATAs. (e.g., Rule 4).

> o What to do when the origination JIP cannot be populated, when call
> forwarding occurs, or a new billable call leg is created. (e.g., Rules 5, 6
> and 7).

It should be noted that the NIIF *Rules for Populating JIP* do not address the use of JIP
with VoIP calls. The NIIF is working an open issue**,** Issue #0246: *Jurisdiction
Information Parameter (JIP) Population Rules when VoIP Technology is Involved for
Some Portion of the Call.* The NIIF continues to examine the use of JIP for VoIP calls,
but has not made any decisions regarding this matter.

Industry Uses of JIP. When properly populated, JIP can provide information that helps
providers identify the call origination point in the SS7 network. Listed below are some
common examples:

- In the wireline environment, JIP can be used to identify the originating switch.
  However, it should be noted that, in the wireline environment, some switches
  serve an area that spans multiple rate centers, or state/LATA boundaries. The
  JIP does not necessarily reflect the rate center, LATA, or state of the calling
  party.
- In a wireless environment, JIP can be used to identify the originating mobile
  switching center (MSC), where technically feasible. However, it should be
  noted that the geographic area served by an MSC is generally much larger
  than the area served by a wireline switch (e.g., MSCs often serve an area
  spanning state, LATA and/or MTA boundaries.) The JIP does not necessarily
  reflect the state/LATA/MTA from where the call was made.
- When performing traffic reconciliation audits, observation of the JIP can
  indicate if a particular traffic routing requires further investigation.
- For trouble ticket resolution, JIP can be used as a tool to identify the
  originating switch.

JIP Limitations. Although the use of JIP has benefits, there are limitations and
constraints such as:
- JIP is not populated in signalling by all providers. (The rules recognize JIP
  may not always be present and that signalling JIP is subject to technical
  feasibility).
- JIP can only be sent via SS7 signalling.
- Lack of consistent signalling application by providers; e.g., some providers
  may not know what or how to populate the six (6) digit data field if they are
  not familiar with the *Rules for Populating JIP*.

Some points relating to billing made during industry discussions of NIIF Issue #0208 are
stated below:

- In general, systems and practices currently in place for intercarrier billing purposes are not configured to interpret or apply JIP, requiring system modifications and either hardware, software or vendor development.
- Wireless JIP is only available at MSC switch level, not at the cell site level. Cell site level enhancements would require vendor development and or extensive switch, system or software modification.
- JIP may not be consistently recorded in switch AMA recordings, requiring additional hardware or software.
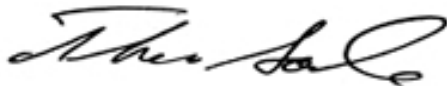- Potential uncertainty surrounding intercarrier compensation reform.

As noted in ATIS Ordering and Billing Forum (OBF) Issue #2308, *Need for Accurate Jurisdictional Information for Accurate Billing,* the OBF identified that the *Rules for Populating JIP* will not always yield an accurate billing jurisdiction as stated in the resolution statement below:

> *The Billing Committee has reached consensus to use the 7 Rules for Populating JIP approved by NIIF in NIOC Issue 0208 to identify the originating switch or MSC. The Billing Committee supports those rules recognizing that the JIP at a state/LATA level will not provide sufficient detail to determine local jurisdiction.*
>
> *The Billing Committee's preferred solution would have been to use the JIP at a cell site level. Based on industry limitations, this was an unworkable solution.*

The ATIS NIIF has provided this information to assist the Commission in understanding the intent of the NIIF's *Rules for Populating JIP*, some limitations of JIP, and its appropriate uses by the industry. ATIS would be happy to provide more information about this issue or to answer any questions that the Commission might have regarding this matter.

Sincerely,

Thomas Goode
Associate General Counsel

cc: Thomas Navin, Chief, FCC Wireline Competition Bureau (via e-mail)
        Catherine W. Seidel, Acting Bureau Chief, FCC Wireless Telecommunications
            Bureau (via e-mail)

Attachment

Alliance for Telecommunications Industry Solutions
Network Interconnection Interoperability Forum (NIIF)
<u>**Rules for Populating JIP**</u>

1.   JIP should be populated in the IAMs of all wireline and wireless originating calls where technically feasible.

2.   JIP should be populated with an NPA-NXX that is assigned in the LERG to the originating switch or MSC.

3.   The NIIF does not recommend proposing that the JIP parameter be mandatory since calls missing any mandatory parameter will be aborted. However, the NIIF strongly recommends that the JIP be populated on all calls where technologically possible.

4.   Where technically feasible, if the originating switch or MSC serves multiple states/LATAs, then the switch should support multiple JIPs such that the JIP used for a given call can be populated with an NPA-NXX that is specific to both the switch as well as the state and LATA of the caller.

If the JIP cannot be populated at the state and LATA level, the JIP should be populated with an NPA-NXX specific to the originating switch or MSC where it is technically feasible.

5.   Where the originating switch cannot signal JIP it is desirable that the subsequent switch in the call path populate the JIP using a data fill default associated with the incoming route. The value of the data fill item is an NPA-NXX associated with the originating switch or MSC and reflects its location.

6.   When call forwarding occurs, the forwarded from DN (Directory Number) field will be populated, the JIP will be changed to a JIP associated with the forwarded from DN and the new called DN will be inserted in the IAM.

7.   As per T1.TRQ2, the JIP should be reset when a new billable call leg is created.