January 31, 2014

Ex Parte
Via Electronic Submission
Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Technology Transitions Policy Task Force, GN Docket 13-5; Numbering Policies for Modern Communications, WC-Docket No. 13-97

Dear Ms. Dortch:

Routing, interconnection and number administration are critical to a transition from TDM to IP. But it is too early in the transition process to predetermine how any of those should be accomplished. iconectiv\(^1\) fully supports the efforts of the Commission and industry to conduct experiments to identify and help answer questions regarding technical concerns and explore technology transition issues, and to do so in a manner that ensures the resiliency of all-IP networks and enables a smooth IP transition. We believe, however, that a recent ex parte filed by NeuStar\(^2\) gets out in front of the industry and consumers in a way that is counter-productive. It pre-supposes the outcome of a

\(^1\) Since February 14, 2013, Telcordia, a wholly-owned subsidiary of Ericsson, has been doing business as iconectiv.

particular approach, e.g., that all IP-related information should be placed in the NPAC, and precludes alternative meaningful experiments that could inform the industry as regards to different or potentially better architectural approaches, as described below.

The IP transition is still in its early days. IP routing and interconnection requirements are still being worked out by industry. It is too soon to identify and fix the changes necessary for number administration and routing data exchange for this next generation environment. Indeed, experimentation is critical to provide industry with sufficient factual data to be able to appropriately define those requirements. Experimentation and testing will produce key information on important issues such as the likelihood of number exhaust, the capability of existing systems to support just-in-time (JIT) number assignment, and the types of changes that may be needed to permit existing systems to support future—as yet unknown—interconnection points.

iconectiv fully supports continued testing. iconectiv is engaged in ongoing, transparent discussions with industry groups to help identify requirements for IP interconnection and what requirements the various design options address. No single approach is perfect, and multiple experiments that test varied approaches will help evolve to the best solutions for the industry and which will maintain the quality of service for consumers. We believe this data driven approach that we are taking will help obtain consensus and enable meaningful experiments with reasonable parameters that will ultimately accelerate the transition to all IP.

To help determine architecture/network configurations for IP routing, we are preparing technical contributions to be submitted under the ATIS PTSC PSTN Transition issue S0120 and to other industry groups (e.g., ATIS INC, NANC FON, LNPA WG) for discussion. These include: 1) a proposal to use existing industry database systems for routing E.164 numbers for hybrid PSTN/IP networks and full IP networks; 2) a proposal to use the LERG as the Tier 1 ENUM registry to enable end-to-end routing of IP calls; and 3) a proposal to use a purpose built ENUM registry as the IP routing solution. It is our belief that industry discussions regarding these proposals can help define the direction of routing and information exchange and clarify the best configurations for trials. We believe the various platforms identified in the above contributions can evolve in an agile manner and we continue to be willing to participate

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in experiments and trials to help the industry determine the IP strategy with all due haste.

We have requested a meeting with the FCC’s Technology Transitions Task Force and plan to discuss these three contributions with the Task Force as soon as schedules permit. This *ex parte notice* is being filed electronically with your office pursuant to Section 1.1206 of the Commission’s Rules, 47 C.F.R. 1.1206.

Respectfully submitted,

[Signature]

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Vice President –Regulatory & Senior Counsel

Cc: Task Force Members  
Tim Brennan  
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