

Summary of V-NXX

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V-NXX Definition

A nomadic telephone number. A telephone call that does not terminate to a person or device in the geographic rate center associated with the NPA.NXX as listed by NANPA.

Example of a V-NXX Call

Person "A" (the calling party) with a landline phone in Jackson, MI which carries a Jackson, MI telephone number calls person's "B" (the called party) Jackson, MI telephone number and person "B" receives the phone call in Lansing, MI.

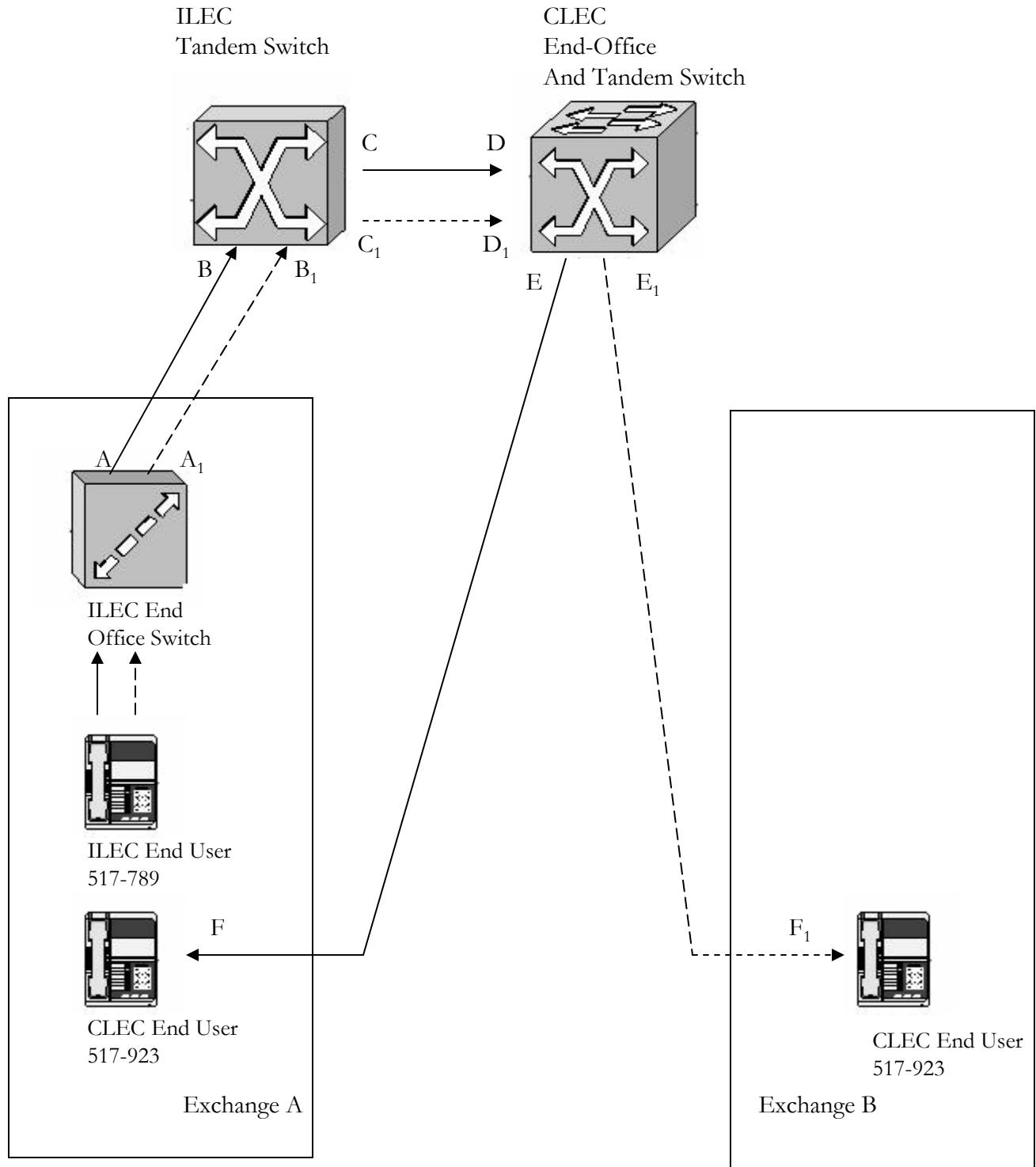
Pervasive Tool

With perhaps some exception, all carriers employ V-NXX. For example, a carrier provided voicemail service is an example of a V-NXX call. Dominate providers such as SBC, Verizon and CenturyTel are not as conspicuous in their deployment of V-NXX as CLECs inasmuch as the vastness of their numbering and switching systems is opaque to this observing this condition. SBC (the leading provider of ISP access lines in Michigan) offers at least two V-NXX products for ISPs (a) omni presence and (b) ensemble. To the extent that a carrier does not employ V-NXX, nothing prohibits them from doing so. While CLEC are certainly the target of this attack, ILECs do not have "clean hands".

Issues

1. Discrimination. There are two parties involved, the originating carrier and the terminating carrier. Foisting the originating carriers' definition of a local call on the terminating carrier is discriminatory. Given that ILECs control the vast majority of telephone lines, the probability of a call originating from an ILEC is greater than a CLEC. Taking away the opportunity for a CLEC to create differentiating services is anti-competitive, especially when ILECs have free reign to deploy V-NXX.
2. Unexpected Toll Charges. If originating carrier levies an originating toll access fee, then the terminating provider is owed LD charges from a potentially unsuspecting caller.
3. What does it mean to be "physically located"? P.O. Box. Cell phone in a closet?
4. Administrative Burden. By what means do carriers advise each other of a V-NXX condition? The legacy numbering plan and signaling systems do not

Diagram of Two NXX Calls – One Virtual



- provide for necessary flexibility and transparency. Disputes between carriers and from consumers will reach epic proportions.
5. LNP. Portability of phone numbers between LECs and CMRS providers exacerbates the ability to understand who is who and what is what.
 6. Undermines emerging technology, productivity and competitive position. Technologies such as VoIP and cellular hold promise to dramatically change the landscape of telecommunications. Stifling the concept of nomadic “one-number” is a regressive position.
 7. Rural communities and fixed income household are hit as second class citizens.
 8. Data over POTS is a ubiquitous enabler of accessibility, versatility and driver of the economy. Point of sale (POS) devices, ATMs, alarm systems, internet access, etc. are critically important to our economy.
 9. What evidence of harm? Is there an extra cost imposed upon the originating carrier as to the ultimate destination of a call. SBC, Verizon, CenturyTel, and ILECs in general have been recording record profits, whereas CLEC industry is under siege.
 10. The interconnection architecture regime in place today was designed to enable competitive carriers so that a new entrant did not have to replicate the network architecture of an ILEC, via switches and or trunking. Hence there will be inherent differences. These differences should not be categorized as inequities. If that yardstick is a double edged sword which is far sharper on the ILEC side.

Recommendations

1. Study the nine cases brought to the MPSC on this issue. Therein is a full and complete record, which examined and revealed, in a “non-charged”, environment a sober account of the arguments and issues.
2. The FCC is reviewing matters of interconnection, compensation, etc. Do not create an artificial, Michigan only, “fix” at this time – nether by law or by commission order.

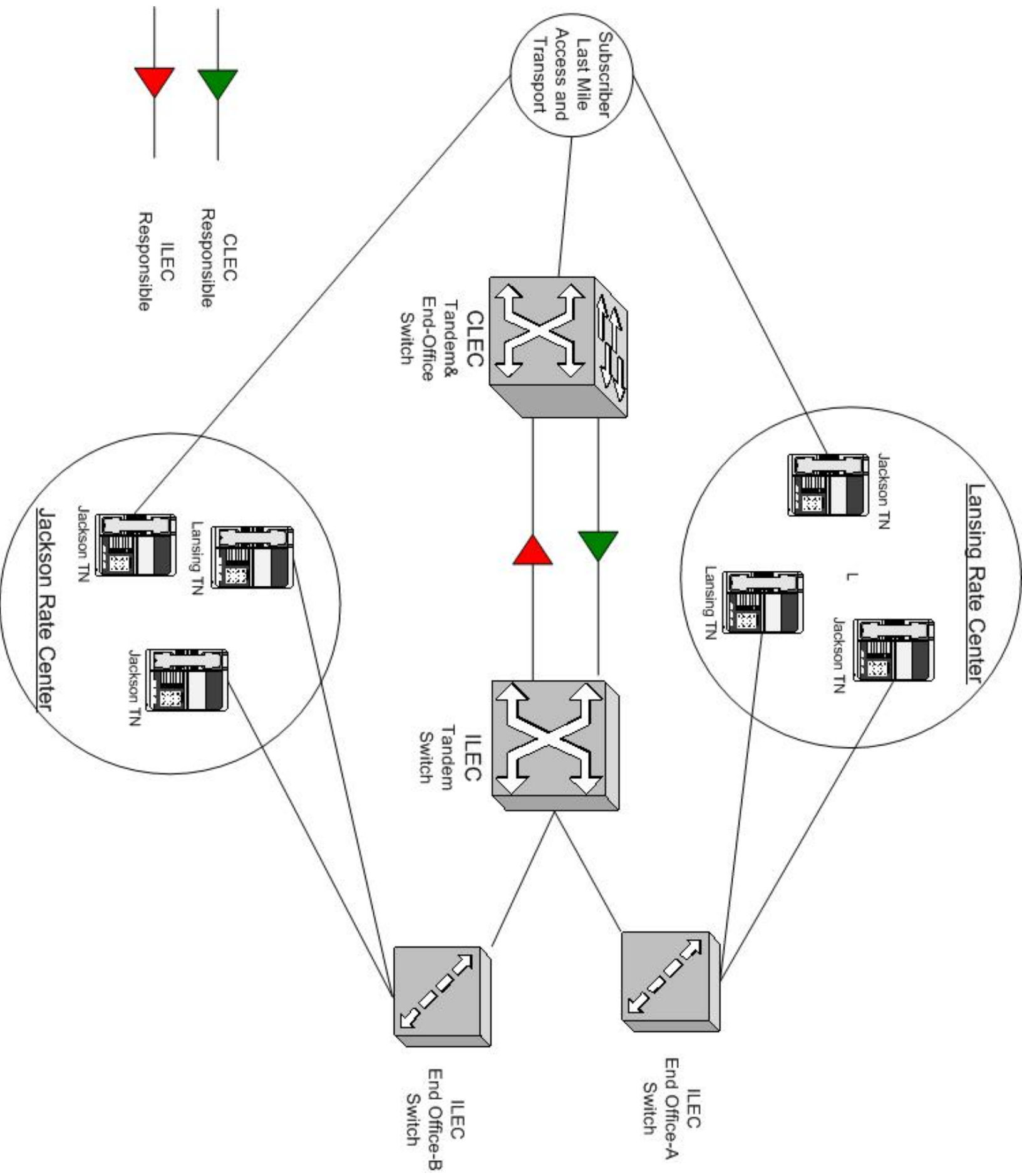


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