Additional information requested regarding COMSAT, Inc.'s application for new Signal Point Codes.

[FCC] A statement regarding the nature of the use of the ISPC(S) in the network. The statement should describe: (1) Why your existing PSTN network needs this ISPC at this time (what changed?); (2) What new services, service improvements/expansion or new applications will be supported by the addition of these ISPC(s); and (3) When these services/applications are expected to "go live." Also describe why multiple codes are needed at this time, as well as how Comsat is currently using its two older ISPCs and how it intends to return them.

What changed:
COMSAT's platform is aged and unsupportable and so COMSAT has made the decision to replace it with a more modern solution, one that provides for efficient IP-based interconnection and ensures a future of interoperability with modern protocols.

Why four new SPCs:
Today COMSAT maintains 3 ISPC nodes.

3-033-6	6414	Southbury, CT	Comsat Mobile Communications
3-033-7	6415	Santa Paula, CA	Comsat Mobile Communications
2-085-0	4776	Oslo MSC1	Telenor Norge AS

The last of these nodes (2-85-0) uses a point code that belongs to another company. COMSAT and Telenor Satellite Services were merged at one point, then split again. As a result this node was provisioned with a Telenor SPC but was never cleanly resolved during the divestiture. Due to personnel turnover this was only recently discovered.

COMSAT needs to prepare connectivity and routing in advance of disconnecting its current platform and as such each location needs a duplicate SPC while it will be running them in parallel. Additionally, COMSAT needs to install an additional switch in its Paumalu, HI location to replace a circuit that is impractical to maintain via direct TDM circuit.

COMSAT has files four inter-related applications for these ISPCs.

Go Live
COMSAT has deployed equipment now and has begun engineering its provisioning and invoicing interfaces. Timing for go-live is planned for May 1, 2020. After go-live, COMSAT expects to return its two current SPCs (3-033-6, 3-033-7) and encourage Telenor Norway to return (2-085-0) if appropriate.

[FCC] A statement regarding the signaling point manufacturer/type.

COMSAT will be replacing its existing hardware with Telcobridges TMG-800 media gateways (performing ISDN and SS7 switching) and the Cirrus class4/5 soft-switch from PhoenixSoft. The soft-switch and accompanying SBCs will lay the groundwork for SIP connectivity and our eventual departure from TDM once the services we provide are no longer supported.

[FCC] The physical address (not just the city) where the ISPC(s) will be located.

Santa Paula Teleport
7676 Pine Grove Rd
Santa Paula CA 96060

Southbury Teleport
2120 River Road
Southbury, CT06488

Inmarsat Hawaii
160 Comsat Rd
Haleiwa, HI 96712

Fucino Space Centre
Piana del Fucino, Ortucchio, Via Cintarella, 67050
Ortucchio AQ, Italy

[FCC] Identification of at least one planned Message Transfer Part (MTP) signaling relation.

Site	Carrier	OPC	STP	SEP/SSP/DPC
Fucino, Italy	Inmarsat	Current:2-085-0	4-240-7	4-253-0
Current: Southbury, CT New: Paumalu, HI	Inmarsat	3-33-6	4-247-0	4-253-5
Southbury, CT	ATT	3-33-6	3-37-0 (Pittsburg)	3-20-0 (New York)
Southbury, CT	ATT	3-33-6	3-37-3 (Sacramento)	3-20-0 (New York)
Southbury, CT	VzB	3-33-6	3-21-4 (West Orange, NJ)	3-182-5 (Elmswood, NY)
Southbury, CT	VzB	3-33-6	3-21-7 (Pottstown)	3-182-5 (Elmswood, NY)
Santa Paula, CA	ATT	3-33-7	3-23-0 (Sacremento)	3-20-4 (Sacramento)
Santa Paula, CA	ATT	3-33-7	3-23-1 (ShermanOaks)	3-20-4 (Sacramento)
Santa Paula, CA	VzB	3-33-7	3-21-4 (West Orange)	3-45-3 (Pottstown, PA)
Santa Paula, CA	VzB	3-33-7	3-21-7 (Pottstown)	3-45-3 (Pottstown)

[FCC] We would also like to see additional information in the network diagram. It should illustrate how the ISPCs will be used. This can be demonstrated by showing: (1) both sides of the ISPC location, that is, the external network and your existing network that the ISPC will connect to; (2) sufficient detail to understand the applicant's network scope, geographic coverage, and shows the PSTN portions of their network; (3) what region(s) of the PSTN network (Europe, Latin America, Asia, etc.) will use the requested ISPC.

Please see attached **COMSAT Voice Network Diagram.pdf.** OPCs were not included as they are being requested.

[FCC] All of these elements need to be included for all five applications. You should include a statement that explains that Comsat has filed 5 inter-related applications for this ISPC request. If you have any questions, please let me know.

Included above, in the "Why Four new SPCs" section.