

ISPC Application Attachment

Application 2 of 3 — STP-C, Ashburn, VA

Applicant: Telnyx LLC

FRN: 0018998724

Filing Type: SPC-NEW — International Signaling Point Code (New Assignment)

Filed Concurrently With: Two (2) additional ISPC applications for STP-B at Equinix CH1 (Chicago, IL) and STP-D at Equinix CH1 (Chicago, IL).

1. Nature of Use of the ISPC

The ISPC requested in this application will be assigned to Signal Transfer Point "STP-C," a new signaling point that Telnyx LLC will deploy at Equinix DC2 in Ashburn, Virginia, as part of its international SS7 signaling network. The code is required for international SS7 interconnection supporting voice and SMS services carried over Telnyx's Section 214-authorized international telecommunications operations (File No. ITC-214-20110228-00052).

Functions of STP-C

- **Address-hiding (SCCP global title translation)** for the Comfone AG (Switzerland) interconnect, in which the originating signaling point's identity is rewritten to the STP's own point code before traffic is forwarded to the international peer.
- **Architectural separation** from Telnyx's transparent-routing Sparkle traffic, which operates under fundamentally different SCCP behavior. A dedicated ISPC for the address-hiding architecture eliminates OPC collision and ambiguity in international peers' MTP3 routing tables.
- **Primary US-East signaling point** of a geographically diverse mated STP pair with STP-D (CH1) for the Comfone interconnect, enabling MTP3 route management (Transfer Prohibited / Transfer Allowed / Transfer Restricted) to independently manage failover between US sites for Comfone traffic.
- **Support for international 3G roaming**, including SMS, in markets served by Comfone.

Technical Justification

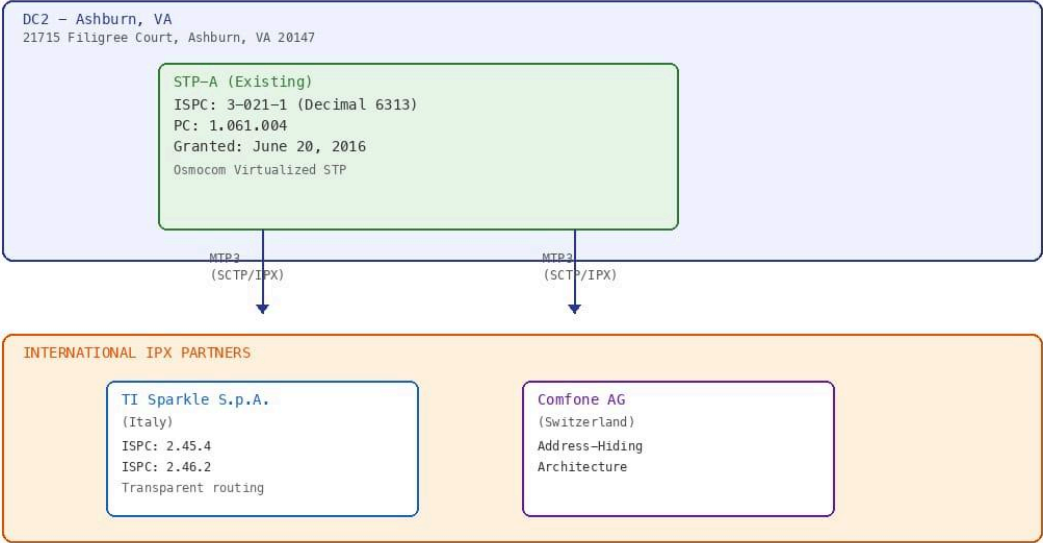
Assigning a distinct ISPC to STP-C (rather than reusing Telnyx's existing code 3-021-1 or co-locating address-hiding traffic with the Sparkle transparent-routing STP) is required to satisfy:

- **ITU-T Q.708 §6 (General Principles)** — Each signaling point in the international SS7 network must be identified by a unique ISPC. The Comfone address-hiding STP performs a fundamentally different signaling function from Telnyx's existing transparent-routing STP and therefore constitutes a distinct signaling entity requiring its own code.
- **ITU-T Q.708 §9 (Criteria for Assignment)** — An ISPC shall be assigned to each signaling point that needs to be uniquely identified in the international network. The address-hiding STP and the transparent-routing STP perform architecturally distinct functions and must be independently identifiable to international partners.
- **ITU-T Q.714 §3 (SCCP Addressing)** — The SCCP Calling Party Address shall unambiguously identify the originating signaling point. When address hiding rewrites the OPC to the STP's own point code, that point code must be unique; otherwise transparent-mode traffic carrying the same code makes the source indistinguishable at the MTP3/SCCP layer for the receiving HLR.
- **ITU-T Q.705 §3 (Signaling Network Structure)** — Mated STP pairs require clear point code identities for route management. Sharing a single ISPC between architecturally distinct STPs (one performing SCCP address manipulation, one performing transparent relay) creates ambiguity in MTP3 routing tables at international partner nodes.
- **ATIS-0300076 (Point Code Assignment Guidelines)** — Recommends unique point codes per physical signaling location and per architectural function to enable proper network management and fault isolation.

2. Network Diagram

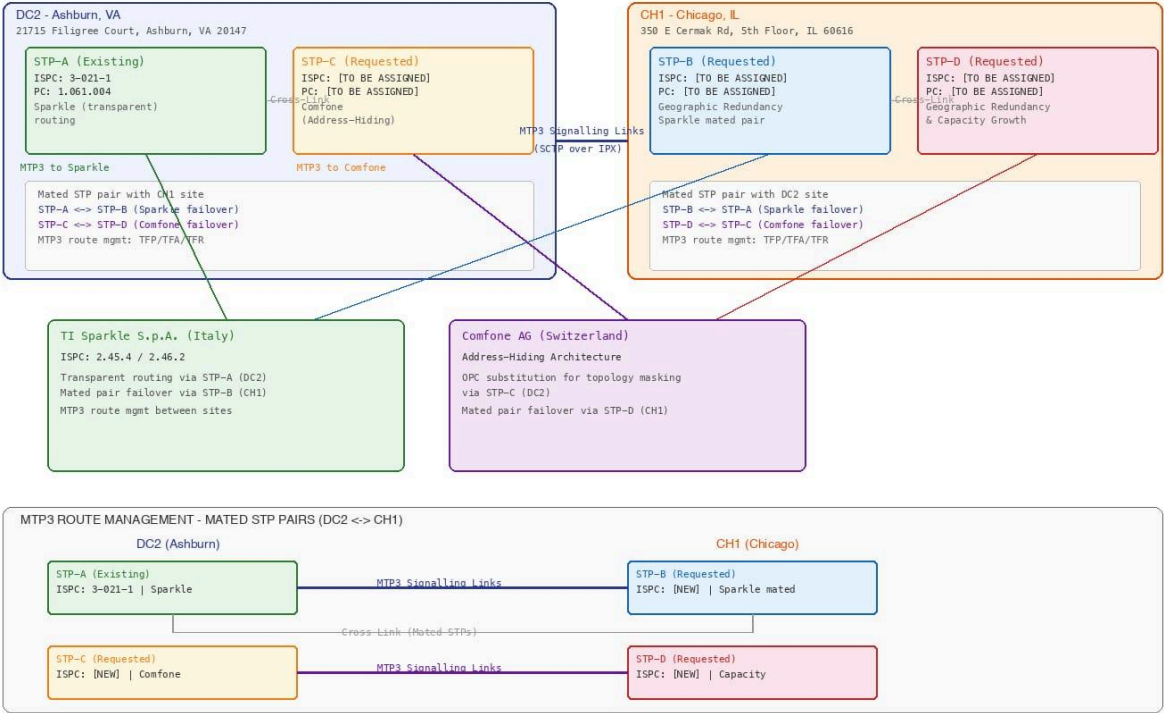
The diagram below depicts Telnyx's international SS7 signaling network, including the existing ISPC assignment (3-021-1 at STP-A in Ashburn), the proposed STP-B signaling point that is the subject of this application, the two sibling signaling points (STP-C at DC2 and STP-D at CH1) and the MTP signaling relations to Telnyx's international roaming partners (TI Sparkle and Comfone).

TELNYX INTERNATIONAL SS7 SIGNALLING NETWORK
CURRENT STATE



NOTE: Single ISPC at a single site = single point of failure

TELNYX INTERNATIONAL SS7 SIGNALLING NETWORK
PROPOSED STATE (After ISPC Grants for STP-B, STP-C, STP-D)



3. Signaling Point Manufacturer and Type

- **Manufacturer:** Osmocom
- **Equipment Type:** Virtualized Signal Transfer Point (STP)
- **Function:** International Signal Transfer Point performing SCCP address-hiding (global title translation with calling-party-address rewrite) for SS7 / MTP3 / SCCP traffic between Telnyx's US signaling network and the Comfone AG signaling network.

4. Physical Address of the Signaling Point

Equinix DC2
21715 Filigree Court
Ashburn, VA 20147
United States

5. Planned MTP Signaling Relation(s)

Telnyx has identified the following planned MTP signaling relations for the ISPC requested in this application.

Primary Signaling Relation

- **Operator:** Comfone AG
- **Address:** Equinix Zurich ZH4, Josefstrasse 225, 8005 Zurich, Switzerland
- **ISPC:** 0.245.1 (decimal 1961)

Secondary Signaling Relation

- **Operator:** Comfone AG
- **Address:** Swisscom DC Lausanne-Savoie, Av. André-Schneitzler 3, 1003 Lausanne, Switzerland
- **ISPC:** 0.245.2 (decimal 1962)

Existing ISPC Holdings

For completeness, Telnyx LLC currently holds one (1) International Signaling Point Code:

- **Code:** 3-021-1 (decimal 6313)
- **Granted:** June 20, 2016
- **File Number:** SPC-NEW-20160603-00003
- **Location:** STP-A, Ashburn, VA
- **Status:** Active service

Cross-References

This application is filed concurrently with two additional ISPC applications by Telnyx LLC for signaling points at Equinix CH1:

- **STP-B** — Geographic redundancy and mated-pair signaling redundancy for the TI Sparkle S.p.A. (Italy) interconnect at CH1.
- **STP-D** — Geographic redundancy partner for STP-C (this application), completing the Comfone address-hiding mated STP pair across DC2 (Ashburn) and CH1 (Chicago).

The three applications form a coordinated network-expansion filing for signaling redundancy and architectural integrity. Cross-reference file numbers will be added once ICFS assigns file numbers to the sibling applications.

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