

ISPC Application Attachment

Application 3 of 3 — STP-D, Chicago, IL

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-C at Equinix DC2 (Ashburn, VA).

1. Nature of Use of the ISPC

The ISPC requested in this application will be assigned to Signal Transfer Point "STP-D," a new signaling point that Telnyx LLC will deploy at Equinix CH1 in Chicago, Illinois, 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-D

- **Geographic redundancy** for Telnyx's Comfone AG (Switzerland) address-hiding architecture, which is otherwise concentrated at a single US site (DC2, Ashburn). Deployment at CH1 eliminates the single-site failure mode for Comfone interconnect traffic.
- **Mated-pair signaling redundancy** with STP-C at DC2 (Ashburn). STP-D acts as the Chicago-side peer of a geographically diverse mated STP pair for Comfone traffic, enabling MTP3 route management (Transfer Prohibited / Transfer Allowed / Transfer Restricted) to independently manage failover between US sites.
- **Capacity growth** for Telnyx's international SS7 signaling plane, supporting expansion of international roaming interconnections and accommodating increased SCCP/TCAP traffic volumes from a growing wireless subscriber base.
- **Support for international 3G roaming**, including SMS, in markets served by Comfone.

Technical Justification

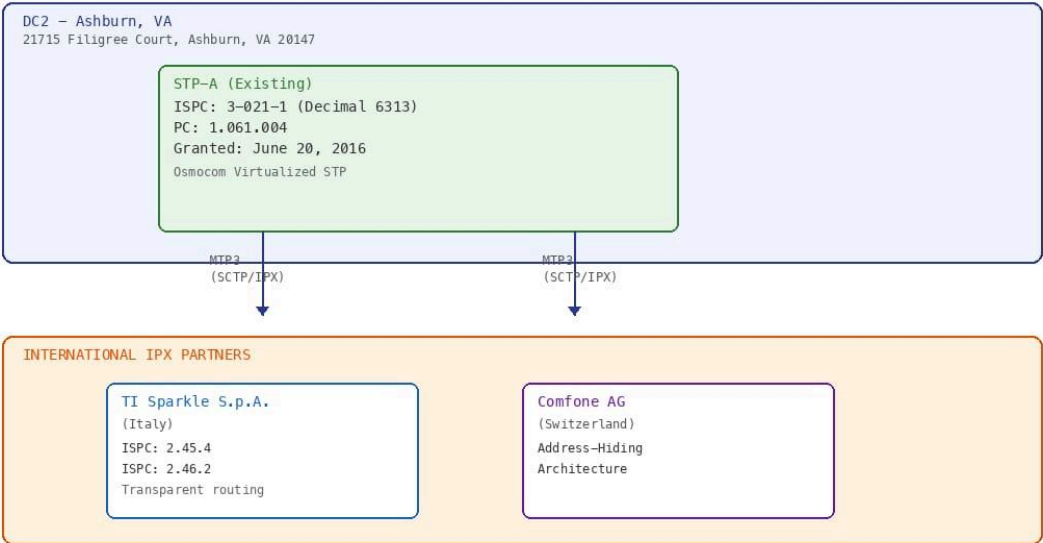
Assigning a distinct ISPC to STP-D (rather than reusing Telnyx's existing code 3-021-1 or sharing STP-C's code) is required to satisfy:

- **ITU-T Q.708 §6 (General Principles)** — Each signaling point in the international SS7 network must be identified by a unique ISPC. A geographically separate signaling point at CH1 constitutes a distinct signaling entity requiring its own code.
- **ITU-T Q.704 §2 (Signaling Network Structure)** — MTP3 route management procedures rely on distinct point codes to identify alternate routes. If CH1 shared DC2's ISPC for the Comfone architecture, MTP3 could not independently manage failover between the two sites — a failure at DC2 would appear identical to a failure at CH1 from the perspective of the Comfone signaling network.
- **ITU-T Q.709 §4 (Hypothetical Signaling Reference Connection)** — The signaling network shall provide alternative paths to meet availability objectives. Without a distinct ISPC at CH1 for the Comfone architecture, no alternative signaling path exists within the United States for Comfone-bound traffic.
- **ITU-T Q.708 §9.7 (Growth)** — An administration may request additional ISPCs when growth in signaling relationships requires additional unique identifiers for network management and routing purposes. Telnyx's expanding international roaming footprint requires additional capacity beyond a single mated STP pair.
- **ATIS-0300076 (Point Code Assignment Guidelines)** — Recommends unique point codes per physical signaling location to enable proper network management and fault isolation.

2. Network Diagram

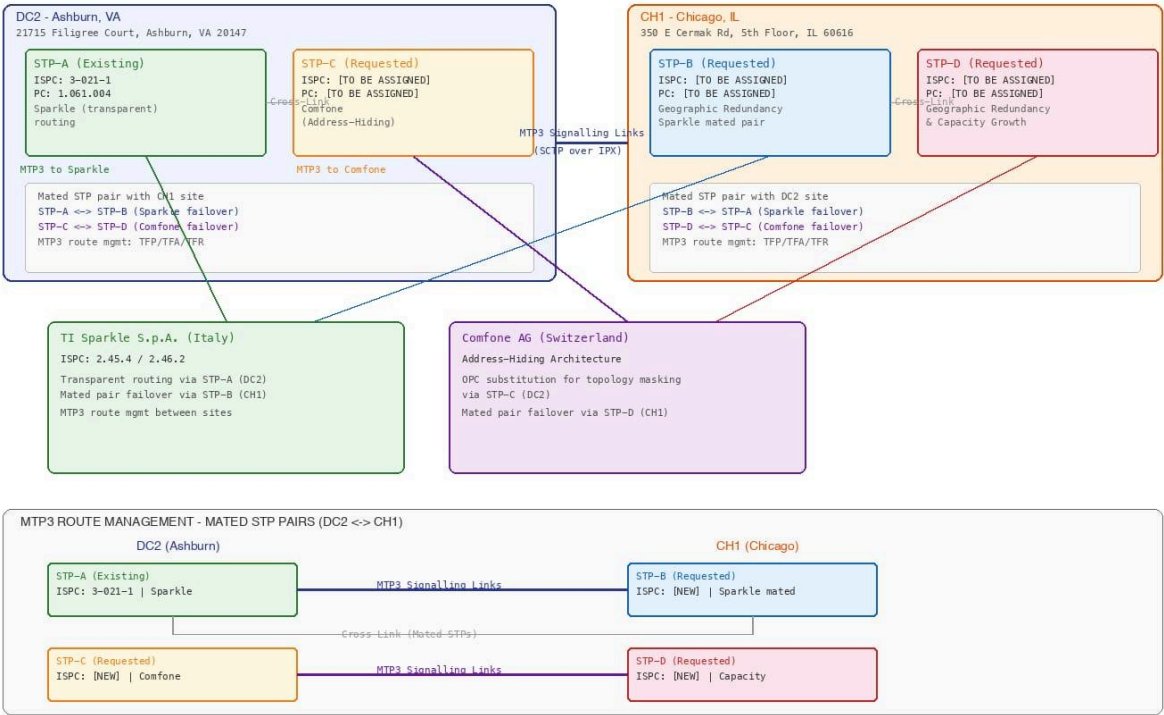
The diagram below depicts Telnyx's international SS7 signaling network, including the existing ISPC assignment (3-021-1 at STP-A in Ashburn), the proposed STP-B signaling point that is the subject of this application, the two sibling signaling points (STP-C at DC2 and STP-D at CH1) and the MTP signaling 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. STP-D is the Chicago-side peer of a geographically diverse mated STP pair with STP-C (DC2, Ashburn).

4. Physical Address of the Signaling Point

Equinix CH1

350 E Cermak Road, 5th Floor
Chicago, IL 60616
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:** 0.249.4 (decimal 1996)

Secondary Signaling Relation

- **Operator:** Comfone AG
- **Address:** Swisscom DC Lausanne-Savoie, Av. André-Schnetzler 3, 1003 Lausanne, Switzerland
- **ISPC:** 0.249.5 (decimal 1997)

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:

- **STP-B** — Geographic redundancy and mated-pair signaling redundancy for the TI Sparkle S.p.A. (Italy) interconnect at Equinix CH1 (Chicago, IL).
- **STP-C** — Address-hiding architecture for the Comfone AG (Switzerland) interconnect at Equinix DC2 (Ashburn, VA); STP-C is the US-East peer of the mated STP pair completed by this application.

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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