

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)
Deployment of Wireline Services Offering) CC Docket No. 98-147
Advanced Telecommunications Capability)
)

**COMMENTS OF THE
ALLIANCE FOR TELECOMMUNICATIONS INDUSTRY SOLUTIONS, INC.
ON BEHALF OF COMMITTEE T1**

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SUMMARY

By these comments, ATIS, on behalf of its sponsored Committee T1, provides information regarding the standards development processes and procedures of Committee T1. They also detail the work of T1A1.7 -- Signal Processing and Network Performance for Voiceband Services; and the work of T1E1.4 on DSL Access which are developing spectrum compatibility and spectrum management standards. These comments also respond to those specific questions raised by the Commission with respect to the processes and work of T1E1.4.

Committee T1, accredited by the American National Standards Institute, develops interconnection and interoperability standards, technical reports and technical requirements for the U.S. telecommunications networks as well as technical positions on subjects under consideration in international standards bodies. Committee T1's standards development procedures provide a due process system, emphasizing fairness, openness, and reasoned decision-making. All meetings of Committee T1 are open to members and non-members. All committee documentation is provided electronically on the T1 Bulletin Board System ("T1BBs"). Written agenda are distributed in advance of the meetings. This openness permits the introduction of standards proposals and contributions by both Committee T1 members and interested parties. Draft standards are publicized for comment by any interested party with a two-thirds majority of Committee T1 members voting required to approve the draft standard.

Committee T1 believes that the work of T1A1.7 and T1E1.4 demonstrates the ability of the industry to develop spectrum compatibility and spectrum management standards in a timely, open, and fair manner. T1A1.7, acknowledging that the performance of V.90 digital modems were restricted by current power levels, and that there was potential for harm to the network if modem power levels were increased, published Technical Report No. 58 -- A Test Plan for Investigating the Crosstalk Potential of Digital Modems Conforming to ITU-T Recommendation

V.90 in January, 1999. At this date, ATIS is coordinating cooperative industry testing with TIA using this test plan. A final report on the test results is expected in late July.

With respect to T1E1.4, the Spectral Compatibility Standards Project (T1E1-38) launched work on a draft standard in March 1998, with the draft standard's release now slated for late June, 1999 via a letter ballot giving Committee T1 members the opportunity for review, comment and approval/disapproval. Interested parties may review and provide comments as well. T1E1.4 expects that the development of this standard will be an iterative process with revision to begin immediately after its approval.

Committee T1 submits that should the Commission formally recognize and endorse T1E1.4 as the place where spectrum compatibility and spectrum management standards should continue to be developed, T1E1.4 stands ready to be responsive. With respect to the Commission's role, Committee T1 supports interaction, in the form of informal information sharing between the FCC and private sector standards developers, to be "an effective mechanism for coordination to meet governmental objectives via the development of public standards."

With regard to whether T1E1.4 is the "best process or forum" for developing spectral density masks, T1E1.4 has been working on spectral power density masks for over a year. This work is part of the draft standard to be released via letter ballot in late June, 1999. With this work already active in T1E1.4, any other conclusion as to where this work should reside could greatly delay this important work. With respect to the concern that T1E1.4 is not representative of the advanced services industry, Committee T1 re-emphasizes the openness of its processes and the opportunities that exist for participation. The current T1E1.4 participation and mailing list distributes T1E1.4 materials to over 400 interested parties covering a wide spectrum of interests. Committee T1, on behalf of T1E1.4, will continue to take steps to encourage and to broaden participation and interest.

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ALLIANCE FOR TELECOMMUNICATIONS INDUSTRY SOLUTIONS, INC.
ON BEHALF OF COMMITTEE T1**

The Alliance for Telecommunications Industry Solutions ("ATIS") submits these comments on behalf of its Accredited Standards Committee, Committee T1, with the Federal Communications Commission (the "FCC" or the "Commission") in response to the FCC's First Report And Order And Further Notice of Proposed Rulemaking ("Further NPRM"). In the Matters of Deployment of Wireline Services Offering Advanced Telecommunications Capability, CC Docket No. 98-147, Adopted March 18, 1999 and Released March 31, 1999. ATIS's comments on behalf of Committee T1 provide general information regarding the processes and standards development procedures of Committee T1. They also detail the current work of Committee T1's Technical Subcommittee T1A1 - Performance and Signal Processing and its Working Group T1A1.7 - Signal Processing and Network Performance for Voiceband Services; and the work of Technical Subcommittee T1E1 - Interfaces, Power, and Protection for Networks, and its Working Group T1E1.4 - DSL Access. These Technical Subcommittees and their

and its Working Group T1E1.4 - DSL Access. These Technical Subcommittees and their respective Working groups are developing spectrum compatibility and spectrum management standards. In addition, these comments will respond to those specific questions raised by the Commission with respect to the processes and work of T1E1.4.

I. INTRODUCTION

Committee T1, a sponsored committee of ATIS,¹ and accredited by the American National Standards Institute (“ANSI”) develops interconnection and interoperability standards,

¹ In addition to Committee T1, ATIS sponsors eleven (11) other open industry committees and forums. They are the Carrier Liaison Committee, which oversees the consensus resolution of “equal access” and network interconnection issues arising on an industry-wide basis; the Ordering and Billing Forum, which deals with issues of access ordering, provisioning, billing, carrier selection and subscription, directory services, and toll free Service Management System Number Administration; the Network Interconnection Interoperability Forum, which addresses issues including interconnection architecture, testing, installation and maintenance, network management, rating and routing; the Industry Numbering Committee, which develops the North American Numbering Plan Administrator guidelines pertaining to such areas as central office codes and carrier identification codes, and addresses issues of local number portability and number pooling; the Toll Fraud Prevention Committee, which has amongst its efforts the development of procedures for distribution of suspect telephone numbers as well as exchange carrier guidelines for centrex clip-on fraud; the Telecommunications Industry Forum, which gives practical application to standards on electronic data interchange, bar coding, and standard coding language as well as the development of implementation guidelines on electronic bonding for the telecommunications industry; the Protection Engineers Group, which develops contributions for submission to accredited standards committees on electrical protection; Standards Committee O5, an accredited standards committee for wood poles and other wood products used in the construction of electrical supply and communication lines; the Network Reliability Steering Committee, which analyzes network outage data, initiates corrective actions as well as preparing Federal Communications Commission reports on these outages and serves as the industry’s liaison to the Network Reliability and Interoperability Council; the SONET Interoperability Forum, which addresses technical/operational issues regarding the implementation of SONET technology; and the Internetwork Interoperability Test Coordination Committee, which manages the cross industry testing program for network reliability, including local number portability testing and Year 2000 testing. An organizational diagram is at Attachment A, and additional information can be found on the ATIS website at <http://wwwatis.org>

technical reports and technical requirements for the United States telecommunications networks. Committee T1 also develops technical positions on related subjects under consideration in various international standards bodies. It focuses on those functions and characteristics associated with the interconnection and interoperability of telecommunications networks at interfaces with end-user systems, carriers, information and enhanced service providers, including switching, signaling, transmission, performance, operation, administration and maintenance aspects. It is also concerned with procedural matters at points of interconnection, such as maintenance and provisioning methods and documentation, for which standardization would benefit the telecommunications industry.

In order to be an accredited committee of the American National Standards Institute (“ANSI”), the committee shall have a secretariat. As a legal entity, ATIS serves as the Committee T1 Secretariat and has the responsibility for a number of important duties for Committee T1, including organizing the Committee, overseeing the Committee’s compliance with its bylaws, maintaining a list of standards for which the Committee is responsible, providing a Committee Secretary to perform administrative work including meeting arrangements, preparation and distribution of meeting documentation and maintenance of all Committee T1 records. ATIS also attends all of the meetings of Committee T1 and submits standards to ANSI for review and approval as American National Standards, as well as, publishes the Committee T1 technical reports and requirements and manages the publication of Committee T1 standards.

ATIS sponsorship of the Committee T1 recognizes that there are industry efficiencies and consumer benefits to be gained by standardization, and that the formulation of basic technical standards, particularly in technologically sophisticated industries such as telecommunications, is

increasingly important. As in the case of any industry effort, ATIS acknowledges that the standards development process may present certain antitrust compliance issues. In particular, ATIS, on behalf of Committee T1, has been cognizant that the standards process must not (1) unfairly advantage one competitor over another, (2) restrict participation and consideration of a wide spectrum of views; (3) exclude competitors from the markets to which the standards apply; (4) exclude new competitors from the marketplace; or (5) inhibit innovation.

ATIS's sponsorship of Committee T1 has been sensitive to these concerns. Consistent with the requirements of ANSI's Procedures for the Development and Coordination of American National Standards,² Committee T1 has established procedural safeguards to ensure that its standards processes operate fairly, that the standards it develops are reasonable, and that its members are not exposed to antitrust risks. Most importantly, membership and full participation in Committee T1 are open to all parties with a direct and material interest in Committee T1 process and activities. There are four membership interest categories: exchange carriers, interexchange carriers, equipment manufacturers, and users and general interest which includes by way of example, user groups, professional associations, and federal and state government agencies. As the Committee T1 Secretariat, ATIS ensures a balanced membership and participation without dominance by any single interest. In keeping with these principles, the T1AG is comprised of equal representation from each of the four interest categories.³

² See The Procedures for the Development and Coordination of American National Standards, (American National Standards Institute, 1998).

³ Committee T1 has taken steps to avoid any interest category imbalance. Should any interest category constitute a majority of the membership, all votes of that interest category shall be weighed in such a way, that the interest category's total possible votes do not constitute a majority of the membership. See Committee T1 Procedures Manual, (11th Issue, October, 1998),

To accomplish its work, Committee T1 has six technical subcommittees (“TSCs”) managed by a Committee T1 Advisory Group. Each TSC recommends standards and develops technical reports in its area of focus such as performance and signal processing (T1A1); interfaces, power and protection for networks (T1E1); internetwork operations, administration, maintenance, and provisioning standards (T1M1); wireless/mobile services and systems (T1P1); services architectures, and signaling (T1S1); and digital hierarchy and synchronization (T1X1).⁴

Committee T1's standards development procedures provide for due process system, emphasizing fairness, openness, and reasoned decision-making. All meetings of the Committee T1, including its technical subcommittees, working groups, and subworking groups are pre-announced and open to members and others having a direct and material interest in the subject matter at hand. Today, all meeting notifications and committee documentation are provided in a totally electronic environment by the Committee T1 bulletin board system (“T1BBS”) as well as in hard copy for those parties requesting such documentation.⁵ Written agendas are also distributed electronically and in hard copy in advance of the meetings.

This openness in the process permits the introduction of standards proposals by both Committee T1 members as well as interested parties. Contributions are not limited to the Committee T1 membership. Draft standards are publicized for comment, and subcommittee, working group, or subworking group participation is open to any interested party. To become a Committee T1 draft standard, it must be voted on by at least one-half of the Committee T1 voting

Section 2.3.5.5, at <ftp://ftp.t1.org/pub/t1/t1proc.pdf>

⁴ An organizational diagram of Committee T1 can be found at Attachment B.

⁵ The T1BBS can be located on the world wide web at www.t1.org

members (including abstentions) and approved by at least two-thirds of the members who vote (excluding abstentions). The draft standard proposal gets circulated in the form of a “letter ballot” whereby Committee T1 and TSC members are given the opportunity to cast their vote as well as offer comment on the proposal. All letter ballots are also posted on the T1BBS and thus, are also available for public viewing and comment. Interested parties can make contributions which would be considered with the letter ballot comments at the open meeting where comment consideration occurs. A system of records documentation is maintained for all draft standards, letter ballots, objections, and appeals.

While a proposed draft standard is in the Committee T1 approval process, the standard is also submitted to ANSI for a sixty-day review on public notice.⁶ This review includes a verification that the requirements for due process, consensus, and other criteria for approval have been met; as well as consideration of any submitted evidence or comments that a proposed standard is contrary to the public interest, contains unfair provisions, is unsuitable for national use, or is technically inadequate. At each level of a standard’s review, there is full opportunity to comment and to dissent to any standards proposal. Any dissenting comments must be properly

⁶ Technical Reports (“TRs”) and Technical Requirements (“TRQs”) do not get submitted to ANSI for further public comment and review as such reports are not intended to be designated American National Standards, although a number of TRs and TRQs have received broad acceptance and implementation like an American National Standard. Committee T1 TRs and TRQs provide a formalized means of making technical information available to the telecommunications industry. They may be typically used to: a) describe/report the status of a standard or study project or otherwise establish a “terms of reference” document for the current and future use of a TSC; b) publish technical data, such as network criteria, network characterizations or service functionality for new or existing services; c) publicize findings of a study, review or survey; or d) document procedures, interworkings or interconnection issues which would benefit the industry but which are not adaptable or practical as a standard. See Section 9.1, Standards Committee T1-Telecommunications Procedures Manual, 11th Issue--October, 1998.

addressed to reconcile differences wherever possible. Industry implementation of Committee T1-developed standards is entirely voluntary.⁷

II. OVERVIEW AND CURRENT STATUS OF COMMITTEE T1'S WORK WITH RESPECT TO SPECTRUM COMPATIBILITY AND SPECTRAL MANAGEMENT STANDARDS

Committee T1, specifically Technical Subcommittee T1A1 on performance and signal processing (hereinafter "T1A1"), and Technical Subcommittee T1E1 on Interfaces, Power and Protection of Networks (hereinafter "T1E1") initiated work on spectral compatibility and spectral management standards several years ago, in advance of the proliferation of the services which would rely on the DSL technologies. An overview and the status of the most current work follows. Committee T1 believes that this work, as discussed herein, demonstrates the ability of the industry via T1E1, as well as T1A1, to develop spectrum compatibility and spectrum management standards in a timely, open, and fair manner.

A. T1A1.7 -- Working Group On Signal Processing And Network Performance: Current Work Programs Related To Spectrum Compatibility And Spectrum Management

When modems conforming to ITU-T Recommendation V.90 were developed, questions were raised regarding the continued need for the FCC's maximum power constraint on encoded analog signals, other than voice, input into the public switched network. Advocates of relaxing these limits argued that if the V.90 digital modem were permitted to transmit at some level in excess of the FCC's current maximum power level, the modem could likely achieve downstream

⁷ For more details on the processes and the standards development procedures of Committee T1, see Committee T1 Procedures Manual (11th Issue, October 1998) at <http://ftp.t1.org/pub/t1/t1-proc.pdf>

data rates closer to the theoretical maximum of 56 kbit/s. In October of 1996, T1A1.7, acknowledging that the V.90 modems were restricted by the current power levels, recognized that there was an unknown factor to any increase in the modem power levels -- the potential for harm to the network in the form of impaired performance to other voiceband services in subscriber cable pairs adjacent to those carrying the V.90 signals.

In response to this potential problem, the T1A1.7 Working Group on Signal Processing and Network Performance for Voiceband Services published Technical Report No. 58 -- A Test Plan for Investigating the Crosstalk Potential of Digital Modems Conforming to ITU-T Recommendation V.90 in January, 1999.⁸ The Technical Report addresses potential quality degradation of existing voiceband services over a subscriber loop that can be caused by new high-speed voiceband data modems operating at transmit signal power in excess of that currently specified in FCC Part 68.308.

At this date and at the request of the FCC's Network Services Division,⁹ ATIS is spearheading cooperative industry testing with the Telecommunications Industry Association using the T1A1.7-developed test plan. The testing is actively underway with a final report as to the test results due in the late July time frame.

In addition, T1A1.7 is developing a draft Technical Report on unbundled voice grade analog loops. This draft technical report provides objectives for several transmission performance

⁸ A copy of the T1A1 Test Report can be obtained at ftp://ftp.t1.org/pub/techrpts/tr.0/tr_58.pdf

⁹ Letter from Anna M. Gomez, Chief, Network Services Division, Common Carrier Bureau of the Federal Communications Commission to George L. Edwards, ATIS President, (April 6, 1999) (on file with ATIS).

parameters on unbundled analog loops and will address limitations for insertion of gain (amplification) to stress that excessive gain can cause distortion and noise on voiceband services on the unbundled loops as well as adjacent loops.

Potential future work may consist of T1A1.7's collaboration with T1E1.4 to assess any potential quality degradation to voiceband services caused by the deployment of new broadband services designed to provide multimedia content to business and residential subscribers.

**B. T1E1.4 -- Working Group On DSL Access: Current Work Programs
On Spectrum Compatibility And Spectrum Management**

The thrust of the spectrum compatibility and management work is occurring in T1E1.4; it began as early as mid-1995. At that time, Committee T1 approved the Spectral Compatibility Project to produce one or more technical reports that would "... describe transmission system parameters and twisted pair cable characteristics that affect spectral compatibility. The purpose of the project was to help avert crosstalk problems associated with the introduction of new twisted pair transmission systems and address all aspects of spectral compatibility for facilities between a central office and the customer-to-network interface." The results of the Study Project indicated that the output of Committee T1 should be a draft proposed American National Standard which would define a condition or set of conditions, which would minimize the probability of interference between twisted pair transmission systems within the same cable.

The Spectral Compatibility Standards Project (T1E1-38) was approved by Committee T1 on February 24, 1998 and work began on the draft American National Standard in March, 1998.¹⁰ In response to the FCC's Round table on Spectrum Compatibility held in October, 1998, T1E1.4

¹⁰ A copy of the Standards Project for Spectral Compatibility of Twisted Pair Transmission Systems (T1E1-38) is at Attachment C.

agreed to accelerate its work on the standards and set an internal milestone of June, 1999 to be ready for a letter ballot vote (*i.e.* full Committee T1 opportunity to review, comment, and approve/disapprove) on the first spectral compatibility draft standard. At this date, the letter ballot will be circulated for comment vote during late June, 1999, meeting the established milestone.¹¹ T1E1.4 has reviewed over one hundred and sixty (160) technical contributions directly related to the draft spectrum compatibility standard during its development. Consistent with the Commission's acknowledgment that the "standards process is continuous in nature,"¹² T1E1.4 expects that the development of this standard will be an iterative process and revision to the initial standard will begin immediately after its approval since the technologies continue to evolve rapidly and new field data is being generated virtually daily.

III. THE CONTINUED ROLE OF T1E1.4 AND THE PROCESSES TO SUPPORT ITS ROLE WITH RESPECT TO SPECTRUM COMPATIBILITY AND SPECTRUM MANAGEMENT

A. T1E1.4's Future Role and An Appropriate Role For The FCC

The Commission's Further NPRM makes several references to T1E1.4 as the appropriate forum to address spectrum compatibility standards as well as standards and practices for spectrum management.¹³ Committee T1 submits that should the Commission formally recognize and endorse T1E1.4 as the place where spectrum compatibility and spectrum management standards

¹¹ The most recent draft of the standard is available on the Committee T1 Web site (<http://www.t1.org>) as T1E1.4/99-002R3 (9e140023.pdf) (<ftp://ftp.t1.org/pub/t1e1/e1.4/dir99/9e140023.pdf>). It is expected that the new draft of the standard being circulated for letter ballot will be available on the T1BBS in late June, 1999.

¹² See Further NPRM at ¶ 80.

¹³ See Further NPRM at ¶¶ 80, 81, 85, and 90.

can be developed in a timely, fair and open manner, T1E1.4 would welcome such acknowledgment and opportunity. It stands ready to be responsive to the Commission's recognition of the role that T1E1.4 could appropriately play and is actively playing in the telecommunications industry. In fact, while the T1E1.4 spectrum work was already in process, the FCC's Office of Engineering and Technology urged Committee T1 "to develop industry based, consensus requirements for the spectral compatibility and spectral management of both new and legacy services in the copper cable plant" and publish this standard "no later than year end 1999."¹⁴ As stated earlier, it is expected that this goal will be met. In this regard and as detailed above, a conclusion by the FCC that would keep the spectrum compatibility and spectrum management standards work in T1E1.4 would take advantage of the active standards development work that T1E1.4 already has underway and has had underway for some time. Moreover, such recognition could encourage and foster even broader interest and representation in T1E1.4.

Such a Commission endorsement would also acknowledge and reinforce the well-established processes of Committee T1 and its TSCs such as T1E1. Committee T1 and its TSC organization, participation, procedures, and safeguards are designed so that technical standards may be developed with the requisite openness, fairness, efficiency, and responsiveness to the public interest. The Committee T1 processes are designed and intended to address the very goals the Commission is seeking for a spectrum compatibility standards setting process: a process which

¹⁴ Letter from Stagg Newman, Ph.D., Chief Technologist, Federal Communications Commission and Douglas C. Sicker, Technical Advisor, Office of Engineering and Technology, to Terry Yake, Chairman of the ATIS Board, George Edwards, President of ATIS, Susan Miller, Vice President and General Counsel of ATIS, Jerry Peterson, Chairman of Committee T1, and Ed Eckert, Chairman of Technical Subcommittee T1E1. (March 17, 1999) (on file with ATIS)

is "competitively neutral in both structure and procedure . . . with representation [sic] equitably spread over all segments of the industry"¹⁵ Committee T1 has been recognized and endorsed by the FCC as an "appropriate organization for developing voluntary technical interconnection standards."¹⁶ To conclude that some other industry body might be better suited to the spectrum compatibility work at this time would impede the momentum of the current T1E1.4 work, create inefficiencies, and possibly delay the delivery of those spectrum compatibility standards to the market place.

In this regard, and with respect to the Commission's belief that it "can play a role in fostering timely, fair, and open development of standards for current and future technologies,"¹⁷ Committee T1 submits that an appropriate role for the Commission with respect to standards setting processes for spectrum compatibility would take into account and acknowledge the existing role of Committee T1 and the work of its T1E1.4. It would also continue the record of past experiences which have shown interactions, in the form of informal information sharing, occurring between the FCC and private sector standards developers as "an effective mechanism

¹⁵ Further NPRM, at ¶ 79.

¹⁶ See, e.g., MTS and WATS Market Structure, Phase III: Establishment of Physical Connections Through Routes Among Carriers ; Establishment of Physical Connections By Carriers With Non-Carrier Communications Facilities: Planning Among Carriers for Provision of Interconnection Services, and in Connection with National Defense and Emerging Communications Services: and Regulations For an In Connection with the Foregoing, Report and Order, CC Docket 78-72, Phase III, 100 FCC 2d 860, 884 (1985), see also In the Matter of Petition to Amend Part 68 of the Commission's Rules to Include Terminal Equipment via Integrated Services Digital Network Access Technology, CC Docket No. 93-268; and In the Matter of Petition to Amend Part 68 of the Commission's Rules to Include Terminal Equipment Connected to Public Switched Digital Service, RM 7815 and RM 6147, Report and Order, Adopted: January 11, 1996; Released: March 7, 1996.

¹⁷ Further NPRM at ¶ 81.

for coordination to meet governmental objectives via the development of voluntary public standards.”¹⁸ As noted in the July 1997 report by the Network Reliability and Interoperability Council of the FCC entitled Network Interoperability: The Key To Competition Report and Recommendations On implementing Section 256 of the Telecommunications Act of 1996 (“NRIC Report”), “these experiences have [sic] shown that existing mechanisms for communicating FCC standardization requirements to the [open] private sector processes have been effective.”¹⁹

The NRIC Report recommended that an appropriate role for the FCC would be to provide “ 1) a single point-of-contact for the informal exchange of information between the FCC and standards developers on activities related to the interconnection requirements of Section 256; and 2) ongoing monitoring of standardization activities via the Internet and Web and, as required, through direct monitoring of key interconnection standardization activities at meetings.”²⁰ Committee T1 leadership and representatives participated in the development of these recommendations and as such Committee T1 would support their application as an appropriate and responsive role for the Commission to play in the context of spectrum compatibility and management standards.

¹⁸ Network Interoperability: The Key To Competition, Report and Recommendations On Implementing Section 256 of the Telecommunications Act of 1996, Prepared by the Network Reliability and Interoperability Council of the Federal Communications Commission, (July 1997), Section 9. Standards Development Process, 9.4.1 Key Learnings, p. 183.

¹⁹ See id.

²⁰ See id. at §9.4.3 Recommendation 3, p.186. This report also recommended that standards developers establish mechanisms to support informal communications with the FCC such as key tracking information on standardization activity. Committee T1 has implemented this recommendation. This tracking mechanism can be found at <http://www.t1.org/reports/nric-rec.htm>

B. T1E1.4 Representation and Participation

With regard to whether T1E1.4 is the “best process or forum for developing future power spectral density masks,” T1E1.4 has been working on power spectral density masks for the spectral management of local loop transmission systems for over a year. This work is consistent with the project proposal for Spectral Compatibility of Twisted Pair Transmission Systems (T1E1-39).²¹ In addition, at the T1E1 meeting held during the week of June 7 through June 11, 1999, it was agreed that the first draft of the standard containing this work would be sent to letter ballot. Thus, Committee T1 submits that the work on spectral power density masks development already resides in and is active in T1E1.4.²² Committee T1 submits that for the Commission to conclude that this work belongs in an activity other than T1E1.4 could greatly delay and stifle this work.

In this connection and with respect to commenters’ concerns, however, that T1E1.4 is not representative of the “developing advanced services as a whole,” Committee T1 submits that this claim appears to be without basis for several reasons.²³ First, and as stated throughout these comments, the processes of Committee T1, its TSCs, and their Working groups are open to members as well as any party with a direct and material interest in the work of the group. Such openness allows Committee T1 members as well as any non-members to initiate a standard, to

²¹ T1E1-38 is at Attachment C.

²² Further NPRM, ¶ 81.

²³ Committee T1 notes that the Commission cites only one commenter in support of the claim that T1E1.4 is not representative of the developing advanced services industry as a whole and may be “overly represented by incumbent carriers and large manufacturers.” Further NPRM, ¶ 81.

make technical contributions to standards in development, and to provide comment on the developing standards. Interested parties are able to attend any of the Committee T1, TSC, working group or subworking group meetings. The only aspect of the process not available to non-T1 members is the actual letter ballot vote which is taken at the point wherein the work on each draft standard is complete, its status is relatively stable, all contributions from members and non-members have been considered, and it is “mature” enough to be sent to ANSI for designation as an American National Standard.²⁴ It is worth noting that the ANSI process allows still another opportunity for interested parties to comment and review the draft proposed American National Standard.

Second, all notices of Committee T1, its TSCs’, working groups’, and subworking groups’ meetings and all meeting materials are readily available on the electronic T1BBS. They are also available in paper format should they be requested. With respect to T1E1.4 specifically, it maintains a mailing and participation list of over four hundred (400) interested parties covering a

²⁴ It should be noted that to become a Committee T1 and/or TSC member is a simple process. The applications are available on the T1BBS at <http://www.t1.org/html/mempkg.htm>. Members of Committee T1 consist of organizations, companies, government agencies, individuals, and others. An interested party can join Committee T1 for \$4300 per year (companies with operating revenues less than \$5 million dollars pay dues of only \$2500 per year), entitling the member to receive all Committee T1 letter ballots to vote on draft American National Standards. Membership in Committee T1 includes, at no additional fee, membership in all six Technical Subcommittees. The Committee T1 membership fees are among the most reasonable in the industry forum process. Membership participation requires that a member not miss more than two consecutive meetings nor fail to respond to at least seventy-five (75) percent of all letter ballots issued per calendar quarter. Failure to do so means the member will be reclassified as an “observer” member. An interested party can choose to join any one of or all six TSCs depending on areas of interest. TSC membership costs \$850 and entitles the TSC member to receive all TSC letter ballots to vote on the draft standards. An applicant to a TSC shall be declared a TSC member if recommended by the Secretariat, ATIS, and upon payment of the appropriate level of dues.

wide spectrum of industry representatives -- including many from the "advanced services industry" as part of the regular distribution of its work.²⁵ T1E1.4 is the largest working group in the Committee T1 organization. Many of the contacts on this extensive mailing list do not regularly attend T1E1.4 meetings, but they do receive notice of the activities, are sent or able to access the meeting materials, and are afforded every opportunity to contribute and actively participate should they choose to do so.

Committee T1 also provides electronic mail lists (*i.e.*, majordomo exploder mail lists) which are open to any interested parties. They allow interested parties to self-subscribe to the electronic mail lists and promote the efficient exchange of information regarding activities, contributions, meetings, etc. For example, T1E1.4 has electronic mail lists which enables interested parties to subscribe to lists pertaining to such specific work efforts as HDSL, VDSL and xDSL performance evaluations.

Committee T1 and its TSCs make frequent efforts to broaden and increase participation at all levels of the Committee T1 organization. Regular "membership recruitment" efforts are made by Committee T1 through an active public relations and marketing program. With its work regularly publicized, information about its activities readily available to all, and the opportunity to participate open to all and simple to do, the concerns do not seem broadly based or well-founded. However, in keeping with Committee T1 and its TSCs' design for openness and its active interest in seeing the expansion and growth of its membership and participation ranks, Committee T1 stands ready to initiate a focused effort to target the members of the "advanced services industry." that are not already present and active in Committee T1. This effort could consist of contact by

²⁵ A copy of the T1E1.4 mailing and distribution list is attached at D.

the Committee T1 and T1E1 leadership with appropriate organizations having advanced services industry members amidst their ranks. These contacts would seek to educate these organizations and their membership about Committee T1 and its processes, review the current spectrum compatibility and spectrum management activities, and encourage membership and active participation in the T1E1 activities. Committee T1 would also continue actively publicizing its work in trade press journals and highlight the spectrum compatibility and management work on its website.²⁶ Any recognition and endorsement of T1E1.4's work as deemed appropriate by the FCC would also do much to focus attention and likely foster active and broader participation. As with all of its processes, Committee T1 is open to contributions suggesting as to how it might further expand its coverage and reach an even broader group of participants. Committee T1 believes that the broader the representation and the participation amongst its ranks, the more responsive and sound its technical solutions can be for the telecommunications industry.

C. T1E1.4 Role In Deployment Of Advanced Services

The Commission seeks comment on methods to encourage the industry to develop “fair and open practices for the deployment of advanced services technologies.”²⁷ It tentatively concludes the T1E1.4 should serve as the forum to establish these practices. While T1E1.4 and Committee T1 generally stands ready to assist, it is not clear what the Commission contemplated in its reference to “deployment practices.” The Committee T1's primary responsibility is for the Commission's tentative conclusion except to the extent that the specific reference to “deployment

²⁶ The T1E1.4 work is already fully available on the T1BBS. However, Committee T1 could consider ways to highlight this work on its opening website pages as an easy and readily accessible status report of its work.

²⁷ Further NPRM, ¶ 85.

practices” is an activity appropriate for the T1E1.4.²⁸ T1E1.4 would be prepared to provide assistance. However, the development of implementation practices related to those standards may be more within the scope of the activities performed within the ATIS-sponsored Carrier Liaison Committee’s subtending fora. For example, the NIIF addresses interconnection issues including the development of installation, maintenance, and network management practices, and related testing plans. The OBF develops guidelines and practices for access ordering, provisioning, and billing, as well as carrier selection and subscription. The Carrier Liaison Committee also has principles and procedures designed to ensure open processes and is a consensus-based, contribution-driven process, as well.

IV. CONCLUSION

In its Further NPRM, the Commission acknowledges the current role of T1E1.4 in developing standards for the various xDSL technologies and tentatively concludes that T1E1.4 could serve as a “common ground” where industry could resolve spectrum compatibility and spectrum management issues. It further recognizes that the “industry can best address many of the details concerning spectral compatibility.”²⁹

In support of these conclusions, Committee T1 submits that its organization including T1E1.4, its broad participation, and its sound procedures are designed so that technical standards may be developed with the requisite openness, fairness, efficiency, and responsiveness to the

²⁸ It might also be noted that depending on what is intended by “deployment practices” for advanced services, other ATIS-sponsored committees such as the Network Interconnection Interoperability Forum (“NIIF”) may be well-suited to this undertaking. Information about the NIIF can be obtained from the ATIS Homepage at <http://wwwatis.org/atis/dlc/niif/niifhome.htm>

²⁹ Further NPRM, ¶ 90.

public interest. Should the Commission ultimately conclude that the spectrum compatibility and spectrum management work best resides in T1E1.4 where it is currently and actively occurring, and endorse T1E1.4's efforts accordingly, ATIS, on behalf of Committee T1, welcomes the opportunity and stands ready to continue to provide an effective forum for the efficient consideration of these important telecommunications industry issues.

Respectfully submitted,

By: _____

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Date: June 15, 1999

Committees**Standards and Guidelines Activities****Standards Committee T1
Telecommunications**

TIA1	T1E1	TIM1	T1P1	T1S1	T1X1
Switching and Signal Processing	Power Systems/Brown Interfaces	Internetwork Planning/Engineering	Wireless/Mobile Services & Systems	Architecture, Services and Control	Synchronization Interfaces
Network Survability	Analog Access	Testing and Operations Systems and Protocols	Personal Communications	Switching and Signaling Protocols	Multicell and Optical Hierarchical Interfaces
Multicells Communications	DSL Access	ANSWER	Wireless Access and Terminal Mobility	Number Portability	
	Wireless Access				
	Wireless Access				
	Electrical and Physical Protection				

Carrier Liaison Committee

Network Interconnection Interoperability Forum	Ordering and Billing Forum	Industry Numbering Committee	Toll Fraud Prevention Committee
Network Interconnection and Maintenance	Access Ordering, Peering/Carrier Billing	North American Numbering Plan Guidelines	Joint Fraud Investigation Guidelines
Network Management	Carrier Selection and Subscription	Local Number Portability	Fraud Center Contact List
Network Interconnection and Architecture	800/888 DNS Number Administration		
Network Rating & Routing Information			

Telecommunications Industry Forum

Bar Code	Information Product Interchange	Standard Coding	Electronic Data Interchange	Electronic Commerce	Electronic Communications Implementation Committee
Bar Code Label Specifications	Standard Generalized Markup Language	Product Identification Nomenclature Guidelines	Data Interchange Standards EDI Guidelines	Electronic Communications Re-engineering Business Processes	Interactive Session Information Implementation of Electronic Communications
Product Package Guidelines	Technical Illustrative References	Telecommunications Industry Product Identifiers			

Protection Engineers Group

Electrical Protection Equipment
Antenna Unit Standards and Specifications

**Standards Committee D5
Wood Poles and Products**

Wood Crossarms and Brackets for Utility Structures
ANSI Standards for Wood Poles, Crossarms and Brackets

Network Reliability Steering Committee

Analysis Network Topology
Initial Corrective Action
Industry/PCC Reports
Visions with PCC's Network Reliability and Interoperability Council

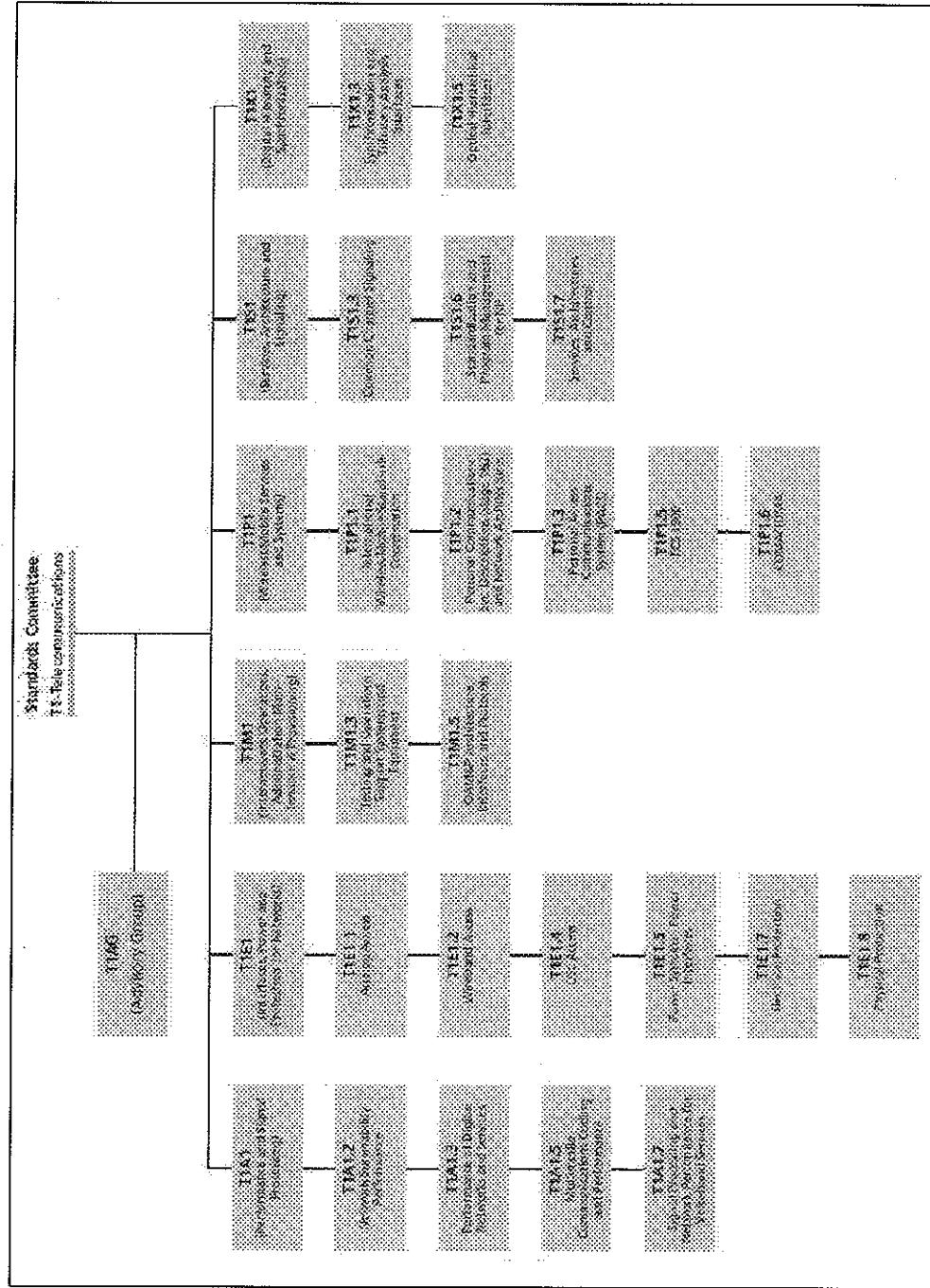
SONET Interoperability Forum

Architecture	Common Applications	Distributed Network Management Environment	Information Modeling	IM Implementation	Remote Login and CIT/OS	Testing
SIP Interoperability Agreements	Handover, Interworking and Diodes Flows	SIP QoS Requirements	Composite Network Level Information Model for Connection Management and Fault Management	Implementation of a SIP Interoperability Model	Multi-vendor NE NE Remote Logon Specification	SIP Abstract Test Suite
T1P1 Interoperability	Inventory Management and Service Monitoring	Security Guidelines and Standardization	Decommodification of SIP Interoperability Open Standards	SIP QoS/QoS Software Database Architecture Specification	SIP Product Register Testing and Conflict Resolution	
SIP Architectural Engineering		Authentication Between IS and NE				
SIP Traffic Profiles and Analysis						

Intersubnet Interoperability Test Coordination Committee

Open Industry Testing Program for Network Reliability Network Testing

ATTACHMENT B



ATTACHMENT C

T1E1-38

T1E1.4/97-384R2

Standards Committee T1 - Telecommunications
Project Proposal

1. Project Identification

1.1 Title

Standards Project for Spectral Compatibility of Twisted Pair
Transmission Systems

1.2 Submitted by

Tom Starr
Ameritech - Room 3C52
2000 W. Ameritech Dr.
Hoffman Estates, IL 60196
847-248-5467

1.3 Date

This project proposal was approved to be sent to Letter Ballot at
the December 1997 T1E1 meeting.

2. Description

2.1 Description of Proposed Project

This project will describe transmission system parameters and
twisted pair cable characteristics that effect spectral
compatibility. The purpose is to help avert crosstalk problems
associated with the introduction of new twisted pair transmission
systems. This project addresses aspects of the spectral
compatibility for facilities between a central office and the
customer-to-network interface.

2.2 Work Products

The proposed project would result in one or more standards or
technical reports which would define a condition, or set of
conditions, which minimize the probability of interference between
twisted pair transmission systems within the same cable.

The conditions may quantify parameters such as:
Frequency dependent power spectral densities
Transmitted signal power
Peak output voltage
Crest factor of the transmitted signal

Outputs from the project may include:
A family of power spectral densities
Description of a loop noise environment which could be used for
system performance
estimates in the absence of self-NEXT.
Pair-to-pair crosstalk coupling characterization.
Cable characteristics.

2.3 Milestones

<u>Milestone</u>	<u>Target Date</u>
Project Approved by Committee T1	1Q98
Draft Standard Ready for TSC Ballot	3Q98
Standard Approved by Committee T1	4Q98
Standard Approved by ANSI	1Q99

2.4 Project Assignment and Resources

2.4.1 Technical Subcommittee Assignment

It is recommended that this project be assigned to TSC T1E1, working group T1E1.4.

2.4.2 Technical Subcommittee Resources

The participants in Working Group T1E1.4 have the necessary technical expertise for this project.

2.4.3 External Resources Required

None anticipated.

3. Justification of Need for the Proposed Project

3.1 Description of Need

Crosstalk is recognized as a principal impairment for many digital transmission systems. As the telecommunications industry becomes both more open and more competitive, spectral compatibility will become increasingly important.

Available technology allows the rapid and inexpensive development of digital transmission systems using a variety of modulation and line coding techniques to achieve very efficient transport of digital data over twisted copper wire pair transmission lines. Systems employing these technologies are found in large numbers in the subscriber loop plant of many local exchange carriers. Standards and technical reports which minimize the possibility of interference between these systems and other digital transmission systems have been written by this committee and other standards committees around the world. These documents also provide assurance of proper

operation of the standardized transport system over specified loops under stated conditions.

There are many applications which are not addressed by existing standards. There are low demand applications for which standardization may never be justified.

With increasing flexibility in the services offered by telecommunications service providers, a wide variety of transmission systems may coexist within a cable. It is essential, however, that any system which is deployed over twisted pairs neither adversely effect nor be adversely effected by other selected transmission systems already deployed or likely to be deployed in the near future. The Standard(s) and Technical report(s) generated by this project will help equipment manufacturers, facilities providers, and twisted pair transmission systems users to ensure spectral compatibility.

3.2 Existing Standards for Practices

Standards and Technical Reports exist for a number of twisted pair transmission systems which are likely to be widely deployed. Examples are:

DDS ~ ANSI T1.410
BRI ~ ANSI T.601
HDSL ~ TR28 and ETSI RTR/TM-03036
T1 ~ T1.403 and T1.408
ADSL ~ T1.413

None of these documents provides a system independent view of spectral compatibility.

4. Related Standards Activity

4.1 Other T1 Technical Subcommittees

None known. Liaison would be accomplished with T1E1.1, T1E1.2, T1M1, and T1A1.

4.2 Other Domestic Standards Activities

Liaison would be accomplished with EIA/TIA TR 41.

4.3 International Standards Activities

None known. ETSI TM6 and ITU SG 15 develop Reports and Recommendations on Digital Transmission. As progress is made within this project, consideration should be given to ETSI TM6 and ITU SG 15 Question 4.

ATTACHMENT D

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ECI TELECOM INCORPORATED	RON MURPHY ECI TELECOM INCORPORATED Depart: 927 FERN STREET ALTAMONTE SPRNG FL, 32701 Phone: 407.830.2512 Fax: 407.830.2580 rmurphy@eciinc.com	VA
ERICSSON INCORPORATED	ALBIN JOHANSSON ERICSSON AUSTRIA Depart: POTTENDORFERSTRASSE 25-27 A-1121 VIENNA, Phone: 43 .1 8.1100 5165 Fax: 43 .1 8.1100 4694 albin.johansson@sea.ericsson.se	VR

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MEMBER	REPRESENTATIVE	STATUS
ERICSSON INCORPORATED	JAN BOSTROM ERICSSON TELECOM Depart: STOCKHOLM, S-126 25 Phone: 46 .8 7.19 9164 Fax: 46 .8 6.81 2428 etxjabo@tn.etx.ericsson.se	VA
ETRIUS	YOUNG IL CHOI ETRIUS Depart: 10832 BROADWATER DRIVE FAIRFAX VA, 22032 Phone: 703.383.9377 Fax: 703.383.1564 etrius@mannam.com	O
EXAR CORPORATION	TONY WONG EXAR CORPORATION Depart: 48720 KATO ROAD FREMONT CA, 94538 Phone: 510.668.7736 Fax: 510.668.7028 tony@exar.com	O
EXCESS BANDWIDTH CORPORATION	CHRISTOPHE HANSEN EXCESS BANDWIDTH CORPORATION Depart: SUITE 103 2475 AUGUSTINE DRIVE SANTA CLARA CA, 95054 Phone: 408.988.3827 111 Fax: 408.988.3834 chris@exbc.com	VR
EXCESS BANDWIDTH CORPORATION	DEBAJYOTI PAL EXCESS BANDWIDTH CORPORATION Depart: SUITE 103 2475 AUGUSTINE DRIVE SANTA CLARA CA, 95054 Phone: 408.988.3827 112 Fax: 408.988.3834 debut@msn.com	VA
FIAMM TECHNOLOGIES, INC.	STEFANO ROSELLINI FIAMM TECHNOLOGIES, INC. Depart: 119 COMMERCE ST. EAST HAVEN CT, 06512 Phone: 203.466.2808 Fax: 203.266.3108 srosellini@fiammen.com	VR

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MEMBER	REPRESENTATIVE	STATUS
FLUKE CORPORATION	FRED KAUEL FLUKE CORPORATION Depart: PO BOX 9090 6920 SEAWAY BLVD., #279F EVERETT WA, 98206-9090 Phone: 425.356.6101 Fax: 425.356.5043 fredk@tc.fluke.com	O
FRAMATOME CONNECTORS USA INC.	RONALD LAI FRAMATOME CONNECTORS USA INC. Depart: FCI ELECTRICAL 47 E INDUSTRIAL PK DR MANCHESTER NH, 03108-9507 Phone: 603.647.5076 Fax: 603.647.5205 rlai@fciconnect.com	VR
FRAMATOME CONNECTORS USA INC.	GARY E. SCHRADER FRAMATOME CONNECTORS USA INC. Depart: FCI ELECTRICAL 47 E INDUSTRIAL PK DR MANCHESTER NH, 03108-9507 Phone: 603.647.5124 Fax: 603.647.5205 gschrader@fciconnect.com	VA
FUJITSU AMERICA INC.	MICHAEL GREEN FUJITSU AMERICA INC. Depart: TWO BLUE HILL PLAZA, 6TH FLR PEARL RIVER NY, 10965 Phone: 914.731.2082 Fax: 914.731.2010 m.green@tddny.fujitsu.com	O
GENERAL DATACOMM INCORPORATED	FRED CRONIN GENERAL DATACOMM INCORPORATED Depart: P.O. BOX 1299 MIDDLEBURY CT, 06762-1299 Phone: 203.574.1118 Fax: 203.573.0069 fred.cronin@gdc.com	O
GLOBESPAK SEMICONDUCTOR, INC.	MASSIMO SORBARA GLOBESPAK SEMICONDUCTOR, INC. Depart: ROOM 1W-04 100 SCHULZ DRIVE RED BANK NJ, 07701 Phone: 732.345.7535 Fax: 732.345.7598 msorbara@globespan.net	VR

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MEMBER	REPRESENTATIVE	STATUS
GLOBESPAN SEMICONDUCTOR, INC.	CLETE GARDENHOUR GLOBESPAN SEMICONDUCTOR, INC. Depart: 8545 126TH AVENUE, NORTH LARGO FL, 33773 Phone: 813.530.8400 Fax: 813.530.8038 cgardenhour@globespan.net	VA
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GTE TELEPHONE OPERATIONS	GARY E. MCANINCH GTE Depart: 700 HIDDEN RIDGE DR, HQW02J81 IRVING TX, 75038 Phone: 972.718.4142 Fax: 972.718.4393 gary.mcaninch@telops.gte.com	VR
GTE TELEPHONE OPERATIONS	PERCY E. POOL GTE Depart: SUITE 900 545 E CARPENTER FRWY, HQB09C51 IRVING TX, 75062 Phone: 972.718.7678 Fax: 972.719.7242 pepool@ieee.org	VA
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HARRIS CORPORATION	RICHARD D. ROBERTS HARRIS CORPORATION Depart: 1586 NORMAN ST, NE PALM BAY FL, 32907 Phone: 407.724.7022 Fax: 407.724.7094 rrober02@harris.com	VA

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MEMBER	REPRESENTATIVE	STATUS
HEKIMIAN LABORATORIES	WILLIAM H. DUNCAN HEKIMIAN LABORATORIES Depart: 15200 OMEGA DR ROCKVILLE MD, 20850-3240 Phone: 301.590.3463 Fax: 301.590.3692 wduncan@hekimian.com	VR
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HEWLETT-PACKARD	RICHARD van GELDER HEWLETT-PACKARD Depart: 1501 PAGE MILL RD, BLDG 2L-3 PALO ALTO CA, 94304 Phone: 650.857.7727 Fax: 650.857.5686 vanguard@hpl.hp.com	VR
HITACHI TELECOM (USA), INC.	STEVE BOOTMAN HITACHI TELECOM (USA), INC. Depart: SUITE 400 801 E. CAMPBELL RD. RICHARDSON TX, 75081 Phone: 972.644.0971 8215 Fax: 972.644.7880 steve.bootman@hitel.com, sbootman@hitel.com	O
HUGHES NETWORK SYSTEMS, INC.	DR LEONARD GOLDING HUGHES NETWORK SYSTEMS, INC. Depart: 11717 EXPLORATION LN. GERMANTOWN MD, 20876 Phone: 301.212.1027 Fax: 301.212.1038 golding@c3po.hns.com, golding@hns.com	O
ICG COMMUNICATIONS	RAUL ROMERO ICG COMMUNICATIONS Depart: 161 INVERNESS DRIVE, W ENGLEWOOD CO, 80112 Phone: 303.414.8101 Fax: 303.414.5846 raul_romero@icgcomm.com	VR

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MEMBER	REPRESENTATIVE	STATUS
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INTEROPERABILITY LABORATORY	SCOTT A. VALCOURT INTEROPERABILITY LABORATORY Depart: UNIV. OF NH 7 LEAVITT LANE, ROOM 106 DURHAM NH, 03824 Phone: 603.862.4489 Fax: 603.862.4181 sav@unh.edu	O
LA MARCHE MFG.	THOMAS DAYMENT LA MARCHE MFG. Depart: 106 BRADROCK DRIVE DES PLAINES IL, 60018-1967 Phone: 847.299.1188 Fax: 847.299.3061 tdayment@aol.com	O
LARUS CORPORATION	ROBERT GROSS LARUS CORPORATION Depart: 1560 BERGER DRIVE SAN JOSE CA, 95112-2703 Phone: 408.494.1500 Fax: 408.494.0732 larus@laruscorp.com	O
LEVEL ONE COMMUNICATIONS INC.	ALBERT H. MILLER LEVEL ONE COMMUNICATIONS INC. Depart: 9750 GOETHE RD SACRAMENTO CA, 95827 Phone: 916.854.2832 Fax: 916.854.2804 amiller@levell.com	VR
LEVEL ONE COMMUNICATIONS INC.	JAMES QUILICI LEVEL ONE COMMUNICATIONS INC. Depart: 9750 GOETHE ROAD SACRAMENTO CA, 95827 Phone: 916.854.2853 Fax: 916.854.1102 jquilici@levell.com	VA
LUCENT TECHNOLOGIES	S. JOHN CHEN LUCENT TECHNOLOGIES Depart: ROOM 4L-322 101 CRAWFORD CORNER RD HOLMDEL NJ, 07733 Phone: 732.949.5179 Fax: 732.949.5055 sjchen@lucent.com	VR

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MEMBER	REPRESENTATIVE	STATUS
LUCENT TECHNOLOGIES	RICK TOWNSEND LUCENT TECHNOLOGIES Depart: ROOM 4K-337 101 CRAWFORDS CORNER RD. HOLMDEL NJ, 07733 Phone: 732.949.8667 Fax: 732.949.1196 rltownsend@lucent.com	VA
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LUCENT TECHNOLOGIES	GERALD H. PETERSON LUCENT TECHNOLOGIES Depart: ROOM 4L-338 101 CRAWFORDS CORNER RD. HOLMDEL NJ, 07733 Phone: 732.949.3498 Fax: 732.949.1196 ghpeterson@lucent.com	NR
MARCONI COMMUNICATIONS	PHIL DILLON MARCONI COMMUNICATIONS Depart: 2100 RELIANCE PKWY BEDFORD TX, 76021 Phone: 817.460.5433 Fax: .. pdillon@star-telegram.com	VR
MARCONI COMMUNICATIONS	JEFFREY VAN HORNE MARCONI COMMUNICATIONS Depart: FIRE NTWKS DIV 2655 VILLA CREEK DR, SUITE 290 DALLAS TX, 75234 Phone: 972.501.7408 Fax: 972.501.7401 jvanhorne@firenetworks.com	VA
MCI WORLDCOM	DARYL TANNIS MCI WORLDCOM Depart: DEPT 1225/107 2400 GLENVILLE DR. RICHARDSON TX, 75082 Phone: 972.729.5417 Fax: 972.729.6038 daryl.tannis@wcom.com	VR

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MEMBER	REPRESENTATIVE	STATUS
MCI WORLDCOM	CURTIS BROWNMILLER MCI WORLDCOM Depart: DEPT 1206/107 2400 N GLENVILLE RD RICHARDSON TX, 75082 Phone: 972.729.7171 Fax: 972.729.7261 curtis.brownmiller@wcom.com	VA
MEDIAONE LABS	PAUL HUGHES MEDIAONE LABS Depart: SUITE 100 10355 WESTMOOR DRIVE WESTMINSTER CO, 80021 Phone: 303.404.8046 Fax: 303.404.8003 phughes@mediaone.com	VR
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MICROCELL CONNEXIONS	MARILYN POIRIER MICROCELL CONNEXIONS Depart: CP 9100 SUCC PLACE BONAVENTURE MONTREAL, QUEBEC, H5A 1K3 Phone: 514.937.9100 8345 Fax: 514.846.7494 marilyn.poirier@microcell.ca	O
MITEL CORPORATION	SILVANA RODRIGUES MITEL CORPORATION Depart: 360 LEGGET DR, P O BOX 13089 KANATA, ONTARIO, K2K 1X3 Phone: 613.592.2122 Fax: 613.592.4784 s_rodrigues@mitel.com	O
MITRE CORPORATION	LARRY STINE MITRE CORPORATION Depart: MS W545 1820 DOLLEY MADISON BLVD. McLEAN VA, 22102-3481 Phone: 703.883.7623 Fax: 703.883.6389 lstine@mitre.org	O

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STATUS

MOTOROLA INC.

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VR

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MEMBER	REPRESENTATIVE	STATUS
----- NETWORK EQUIPMENT TECHNOLOGIES	HEATHER WAGNER NETWORK EQUIPMENT TECHNOLOGIES Depart: 6500 PASEO PADRE PKWY, MS 2108 FREMONT CA, 94555 Phone: 510.574.2680 Fax: 510.574.4027 tony_raetz@net.com , heather_wagner@net.com	O
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NEWBRIDGE NETWORKS CORP.	MARTIN LaROSE NEWBRIDGE NETWORKS CORP. Depart: 600 MARCH RD, PO BOX 13600 KANATA, ONTARIO, K2K 2E6 Phone: 613.591.3600 Fax: 613.591.3680 mlarose@newbridge.com	VA
NEXT LEVEL COMMUNICATIONS	SABIT SAY NEXT LEVEL COMMUNICATIONS Depart: 10 WATERVIEW BLVD., 3RD FLOOR PARSIPPANY NJ, 07054 Phone: 973.299.6689 Fax: 973.299.8030 ssay@nlc.com	VR
NEXT LEVEL COMMUNICATIONS	JEFFREY WEBER NEXT LEVEL COMMUNICATIONS Depart: 10 WATERVIEW BLVD., 3RD FLOOR PARSIPPANY NJ, 07054 Phone: 973.290.0020 Fax: 973.984.5875 jweber@nlc.com	VA
NOKIA CORPORATION	KARI LANG NOKIA CORPORATION Depart: NOKIA RESEARCH CTR, PO BOX 407 FIN-00045, NOKIA GRP Phone: 358. 94.3766593 Fax: 011.358.043766227 lang@research.nokia.com	FO

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OKI AMERICA INCORPORATED	HISAO FUJIKAWA OKI AMERICA INCORPORATED Depart: THREE UNIVERSITY PLAZA HACKENSACK NJ, 07601 Phone: 201.646.0011 X213 Fax: 201.646.9229 hfujikawa@okiamer.com	VA
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MEMBER	REPRESENTATIVE	STATUS
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MEMBER	REPRESENTATIVE	STATUS
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PMC-SIERRA, INC.	C. KEVIN HUSCROFT PMC-SIERRA, INC. Depart: 105-8555 BAXTER PLACE BURNABY BC, V5A 4V7 Phone: 604.415.6039 Fax: 604.415.6205 huscroft@pmc-sierra.com	O
PREMISYS COMMUNICATIONS, INC.	BORIS J. AUERBUCH PREMISYS COMMUNICATIONS, INC. Depart: 48664 MILMONT DR FREMONT CA, 94538-7353 Phone: 510.353.7620 Fax: 510.353.7670 boris.auerbuch@premisys.com	O
RAYCHEM CORP.	PIETER VERSAVEL RAYCHEM CORP. Depart: MS 543/2A 300 CONSTITUTION DR MENLO PARK CA, 94025 Phone: 650.361.2224 Fax: 650.361.5157 pversave@raychem.com	O
SAFT AMERICA INC.	OLE VIGERSTOL SAFT AMERICA INC. Depart: 711 INDUSTRIAL BLVD. VALDOSTA GA, 30601 Phone: 912.247.2331 Fax: 912.245.2880 old.vigerstol@saft.alcatel-alsthom.com	O

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SBC COMMUNICATIONS, INC.	JOHN E. ROQUET SBC TECH. RES. Depart: 9505 ARBORETUM BLVD AUSTIN TX, 78759-7299 Phone: 512.372.5843 Fax: 512.372.5891 jroquet@tri.sbc.com	VR
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MEMBER	REPRESENTATIVE	STATUS
SPRINT - LOCAL TELECOM. DIV.	IRVIN YOUNGBERG SPRINT - LOCAL TELECOM. DIV. Depart: P O BOX 11315, KSWES B0114 KANSAS CITY MO, 64112 Phone: 913.624.2740 Fax: 913.624.8963 pete.youngberg@mail.sprint.com	VR
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SUMITOMO ELECTRIC USA INC.	HIROMITSU AWAI SUMITOMO ELECTRIC USA INC. Depart: 3235 KIFER RD., SUITE 150 SANTA CLARA CA, 95051 Phone: 408.737.8517 Fax: 408.737.0134 hawaii@sumitomo.com	O

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VR = VOTING REPRESENTATIVE

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NR = NOT ON ROSTER

L = LIAISON

TIE1.4

COMBINED MAILING AND PARTICIPANTS LIST

June 14, 1999

(M = on mailing list P = on participant list)

List includes those who were on the mailing and participants list as of the above date. To make any additions or modifications to the mailing list, please contact Massimo Sorbara at 732-345-7535, Fax 732-345-7592, or email msorbara@globespan.net.

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