

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

Commercial Wireless Division Seeks)
Comment on its Proposed Guidelines for)
Cellular SID Administrators) WT 00-239
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**COMMENTS OF THE ALLIANCE FOR TELECOMMUNICATIONS
INDUSTRY SOLUTIONS (ATIS) ON BEHALF OF THE INTERNATIONAL
FORUM ON ANSI-41 STANDARDS TECHNOLOGY (IFAST)**

The Alliance for Telecommunications Industry Solutions (“ATIS”)¹ submits these Comments on behalf of the International Forum on ANSI-41 Standards Technology (“IFAST”) with the Federal Communications Commission (“FCC” or the “Commission”) in response to the FCC’s Public Notice seeking comments on the proposed guidelines to be used by the party or parties recognized as the United States (“US”) Cellular System Identification Numbers (“SID”) Administrator(s) and drafted by the Commission, *Guidelines for Cellular SID Administrators* (“Guidelines”).² Initially, it is important to

¹ ATIS is a member company organization that is a leader for standards and operating procedures for the communications industry. More than 1,500 experts from over 400 telecommunications companies participate in ATIS' 17 committees, forums, and Incubator Solutions programs, where work focus includes network interconnection standards, number portability, improved data transmission, wireless communications, Internet telephony, E-9-1-1, VoIP, Security standards, and order and billing issues. Members of ATIS and committee participants include, but are not limited to, telecommunications service providers, manufacturers, software developers, resellers, enhanced service providers, and providers of operations support. For more information on ATIS, please see www.atis.org.

² Commercial Wireless Division Seeks Comments on Its Proposed Guidelines for Cellular SID Administrators, *Public Notice* DA 03-864, rel March 25, 2003. By Public Notice on November 7, 2002,

note that neither ATIS nor the IFAST wish to be a US SID Administrator. The IFAST applauds the Commission's initial request for comment on the proposed US SID Administration Guidelines and encourages the Commission to support the continued input of all interested parties by requiring the US SID Administrator(s) to provide for such input. Additionally, the IFAST encourages the Commission to require the US SID Administrator(s) to coordinate and work with the IFAST, due to its role as the international SID Administrator.

The IFAST is an open international telecommunications forum with a mission to increase the awareness and value of ANSI-41 networks to operators and their customers.³ IFAST facilitates the identification and resolution of issues to enable the interoperability of systems between countries, carriers, technologies and standards using the ANSI-41 family of standards while evolving to a seamless global network. More than 109 organizations participate in IFAST, including wireless service suppliers, network operators, equipment suppliers, government organizations, consultants and industry

the FCC announced that it was beginning the process of transitioning the administration of SIDs from the FCC to the private sector. *See* FCC Begins the Process of Privatizing the Administration of System Identification Numbers for Cellular Systems, *Public Notice* DA 02-2953, rel November 7, 2002. In Comments filed in response, nine parties expressed an initial interest in performing the role of SID Administrator. By letter, the Wireless Division asked these nine organizations to provide their input on the responsibilities of a SID Administrator and their suggested guidelines for the process. *See* Letter from Roger S. Noel, Federal Communications Commission, to Michael Altschul, Cellular Telecommunications and Internet Association, et al., *Letter* DA 02-3493 (WTB rel December 19, 2002.) The Commission has drafted general guidelines, *Guidelines for Cellular SID Administrators*, to be used by all parties who are recognized as a Cellular SID Administrator. In this Public Notice, the Commission is seeking comment on these proposed Guidelines.

³ Currently, wireless networks are based on multiple technologies. Wireless carriers utilize international Inter-standard roaming which allows customers to roam on different wireless networks that utilize different standards. These standards include the ANSI-41 family of standards (Analog, NAMPS, CDMA, TDMA) and the Global System for Mobile Communications (GSM) standard.

associations. IFAST has members on every continent (except Antarctica) and participants from 37 countries.⁴

In furtherance of its mission to ensure international roaming, the IFAST develops guidelines and assigns International Roaming Mobile Identification Numbers (“IRMs”) to carriers offering international roaming services. IRMs allow for international roaming and ensure unique identification of each active mobile phone subscription. The IFAST also oversees the administration of international SIDs. In this capacity, the IFAST coordinates with all SID assignees, including the United States, to ensure that there is no overlap, duplication, or conflict between the international and US SIDs. Therefore, as the privatization of the SID administration process in the United States is considered by the Commission, the IFAST activities, specifically regarding the aspect of coordination with international SIDs, should be taken into account.

Initially, it is important to note that neither ATIS nor the IFAST wish to be a US SID Administrator as suggested in the original Public Notice.⁵ The IFAST maintains that having multiple SID Administrators is not a feasible approach to US SID administration. There is not enough activity to warrant multiple administrators, nor is there sufficient revenue potential. Furthermore, multiple US SID Administrators could lead to confusion, and a lack of coordination, in the SID administration process.

With respect to the Commission’s proposed Guidelines, IFAST asserts that all interested parties should be invited to develop, and have input to, the Guidelines in order

⁴ IFAST participants include representatives from Argentina, Brazil, Canada, Colombia, Chile, France, Israel, Japan, Kazakhstan, Korea, Malaysia, Mexico, Paraguay, Peru, Philippines, Russia, Taiwan, United Kingdom, United States, and Venezuela.

⁵ See FCC Begins the Process of Privatizing the Administration of SIDs from the Identification Numbers for Cellular Systems, *Public Notice* DA 02-2953, rel November 7, 2002.

to ensure fairness to all interested parties, and accuracy. Therefore, the IFAST applauds the Commission's Public Notice seeking initial comment on these Guidelines.

Furthermore, IFAST maintains the Guidelines should specify the range of numbers available for US SID assignment, to ensure initial and complete alignment with international SID assignment blocks.

The FCC should mandate in the Guidelines that the US SID Administrator(s) must coordinate and consult with the IFAST, due to its role as the international SID Administrator. The IFAST is an established, internationally recognized and active consensus body. By way of example, following are some of the international SID administration activities that have occurred since IFAST took over international SID coordination:⁶ the assignment of a block of 16 SID codes to Kazakhstan; the recognition of SID code usage for Uzbekistan; the reclamation of a portion of the SID codes from Poland, Sweden, Ireland, Finland, Malta, Saint Vincent and the Grenadines, Belize, Chile, and Denmark; the reshuffling of a SID code block assignment to Mexico; and the documentation of SID conflicts for carriers in Bangladesh, Aruba, Mexico and Ecuador.

IFAST strongly encourages the Commission to develop a plan for the oversight of the US SID Administrator(s) and the administration process. As currently contemplated, there is no method for carriers, manufacturers, and other interested parties to provide input into the administration process. Therefore, an oversight council should be established to develop the Guidelines and to provide a venue for those other than the

⁶ The IFAST has been in existence since 1997, and was originally sponsored by the Cellular Telecommunications & Internet Association (CTIA). CTIA resigned as Secretariat of IFAST in 1999. In the interim, the Telecommunications Industry Association (TIA) served as Secretariat until a permanent entity could be found to serve in this capacity. In 2000, ATIS took over as Secretariat of IFAST.

Administrator(s) to provide input into the Guidelines and the administration process as a whole. The IFAST believes that this duty could be assumed by the IMSI Oversight Council (“IOC”), which is sponsored by ATIS, and already performs a similar role in the industry. The IOC is an open industry committee of telecommunications companies and other organizations with a direct interest in the management of IMSI codes.⁷ The IOC is responsible for overseeing the management of IMSI codes that have been assigned to the United States and its possessions as authorized by the U.S. Department of State, since 1996. Furthermore, the IOC is responsible for the *IMSI Administration and Maintenance Guidelines*, a document that establishes procedures for assigning IMSI codes. The IFAST believes that the IOC could assume the oversight duties of the administration of United States SIDs, or those duties could be assigned to a similar organization if the Commission deems more appropriate.

CONCLUSION

On behalf of the IFAST, ATIS respectfully submits these comments in response to the Commission’s Public Notice, DA 03-864, in an effort to provide information regarding the administration of Cellular System Identification Numbers in the United States, as well as the Commission’s proposed Guidelines

⁷ An IMSI is a 15-digit number used within mobile phones that allows service operators to identify mobile terminals, for purposes of international roaming.

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