



Alliance for Telecommunications
Industry Solutions

Problem Solvers to the
Telecommunications Industry

May 3, 2001

VIA HAND DELIVERY

Magalie Roman Salas
Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW, Room TW-A325
Washington, DC 20554

RECEIVED

MAY - 3 2001

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: *Ex Parte* Meeting in CC Docket No. 99-200

Dear Ms. Salas:

On April 18, 2001, at the request of the Federal Communications Commission (the "FCC" or the "Commission"), representatives from the Industry Numbering Committee ("INC"), a committee sponsored by the Alliance for Telecommunications Industry Solutions, met with FCC staff to review the INC correspondence to the FCC dated March 20, 2001 ("Letter" or "INC Letter"). In attendance, representing the Commission, were Yog Varma, Deputy Chief, CCB; Diane Griffin Harmon, Deputy Division Chief; Cheryl Callahan, Designated Federal Officer, NANC; and Sanford Williams, Attorney-Advisor, NSD. The individual representing the INC was Norman Epstein, Verizon, and INC Moderator. Also present were Anna Miller with Voicestream, and Lori Messing with CTIA, representing wireless industry concerns.

The purpose of the meeting was to discuss the Letter sent by the INC to the FCC regarding INC notification to clarify initial Code/Block application facility readiness and license certification requirements under FCC CC Docket No. 99-200. The purpose of the INC Letter was to inform the FCC that the INC had reached consensus that one of the following documentation choices would suffice as proof of facilities readiness as additional options to those cited in the Report and Order¹, namely: (1) a pre-planning checklist; (2) written verification of cell site or transmitter tower construction schedule when applicable; and (3) a confirmation letter listing active NXX codes utilizing existing facilities. In addition, the INC also noted that it had agreed upon changes to the certification process that would allow for a one-time certification for an entire NPA. The INC stated that, since these recommendations constituted points of clarification consistent with the Report and Order, the INC would modify the INC Central Office Code (NXX) Assignment Guidelines and the INC Thousands-Block Number (NXX-X) Pooling Administration Guidelines appropriately.

¹ First Report and Order, *In the Matter of Number Resource Optimization*, CC Docket No. 99-200, released March 31, 2000 (FCC 00-104) (hereinafter "Report and Order").



Standards Committee T1
Telecommunications



Carrier Liaison Committee



Telecommunications
Industry Forum



Network Interconnection
Interoperability Forum



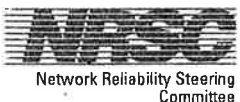
Ordering and Billing Forum



Protection Engineers Group



Standards Committee 05



Network Reliability Steering
Committee



Network and Services
Integration Forum



Telecommunications Fraud
Prevention Committee



Industry Numbering Committee



Internetwork Interoperability
Test Coordination Committee



Generic Requirements
Users Group



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Global Crossing

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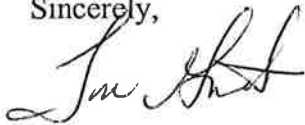
General Counsel
Megan L. Campbell
ATIS

However, the FCC expressed concerns during the *ex parte* meeting that these proposed modifications to the INC Guidelines did not reflect the intention of the Report and Order. With respect to the issue of license certification, the FCC staff stated that, according to the Report and Order, an applicant must demonstrate their certification in a given rate center. In the situation where the state has only one NPA code with multiple rate centers, the entity must receive a different certification for each rate center; it is not assumed that they are certified in all rate centers within that NPA. Therefore, FCC staff concluded that the proper demonstration of certification is to attach the certification documentation for all initial code applications.

Regarding facilities readiness clarifications, the Commission staff did not object conceptually to the INC's recommendations. However, they instructed the INC to indicate that the list is not exhaustive, and that states have the right to establish their own criteria with a reference to the paragraph in the Report and Order that states this allowance. The FCC staff present reviewed the examples provided by the INC in an attachment to the Letter², and stated that points b, d and e should be more fully qualified so that they relate clearly to circumstances where the code is being used for an initial market entry situation³. The FCC staff did not provide specific changes to the wording; however, they suggested tightening the language so that the examples clearly relate to providing service within sixty (60) days of the resource activation date.

Pursuant to Section 1.1206(a)(1) of the Commissions Rules, ATIS submits an original and one copy of this notice of *ex parte* contact for inclusion in the public record of the above-referenced proceeding. Please date-stamp and return the extra copy to our messenger. Should you have any questions regarding this matter, please contact me at (202) 434-8830.

Sincerely,



Toni E. Gilbert
Staff Attorney

Enclosure

cc: Yog Varma, Deputy Chief, CCB
Diane Griffin Harmon, Deputy Division Chief, CCB
Cheryl Callahan, Designated Federal Officer, NANC
Sanford Williams, Attorney-Advisor, NSD

² The Attachment ("Attachment") entitled, "INC Proposal: Supporting Information for Initial Code/Block Requests to Clarify Facility Readiness and License Certification of the FCC and States" is also attached to this correspondence for reference.

³ Among other things, the Attachment outlines the acceptable documentation to provide evidence of facility readiness. It lists examples, delineated as (a)-(h).

INC Proposal
**Supporting Information for Initial Code/Block Requests to Clarify Facility
Readiness and License Certification of the FCC and States**

I. Code/Block Applicant to provide one form of documentation from each category:

1. License and/or Certification:

Service provider has a license or authority issued by the FCC OR a Certificate of Public Convenience and Necessity (CPCN) issued by a State Regulatory Body to provide service in city and state/rate center/MSA#/RSA#/MTA#/BTA#/national /LATA

(Attach copy of FCC license or authority or CPCN)

Note: A one-time certification within an NPA is sufficient because certification is typically granted on an NPA basis. NANPA and/or Pooling Administrator will retain service provider certifications on file.

2. Facility Readiness:

Provide appropriate evidence, via a copy of any one of the following document(s) the carrier selects, that service is or will be in place within 60 days of the numbering resources activation date as applicable to the type of service being offered:

- a. An executed interconnection agreement exists between a Local Exchange Carrier and service provider requesting numbering resources. The relevant pages are the cover page, area covered by and the signature page from the interconnection agreement.
- b. Service Provider developed business plans to provide service in this area. Relevant excerpts from the Business Plan to include planned coverage area and in service dates.¹
- c. A letter from the SP indicating the scheduled switch installation complete date (month/day/year), including the address location, as well as Point of Interconnection or CLLI

¹ Provision of business plans may not be sufficient proof of facilities readiness in some serving areas.

- d. The service order request, pre-planning checklist, or the equivalent to show that facilities for origination or termination for calls have been requested and are anticipated to be completed prior to the effective date of the code/block. (Attached, please find an example of a pre-planning checklist showing identified fields which must be completed).
- e. A confirmation letter or letter of intent provided by the entity with which the requesting carrier will interconnect. (*Please note that interconnecting carriers are encouraged but not required to provide such letters).
- g. The construction schedule including the following information: site identifier, latitude and longitude of the cell site, and its construction start or complete date.
- h. A letter from the requesting carrier, listing a working code/block using such facilities for an initial code/block request in a rate center that will utilize existing facilities and switches serving another rate center.

*All documentation submitted will be held confidential pursuant to FCC confidentiality rules.*²

² 47 CFR, § 52.13 (c) (7)

LOCAL INTERCONNECTION PRE-PLANNING CHECKLIST

***Service Provider must complete asterisked fields**

*CHECKLIST ISSUE DATE (m/d/yr):

PROJECT ID:

*CITY: _____ *STATE: __ *LATA:

CLEC INFORMATION

- *CLEC NAME :
- CCNA :
- LOCAL CIC :
- *CONTACT NAME :
- *NUMBER : _____ ext. _____
- *FAX :
- *Internet Address :

CLEC SWITCH

- ADDRESS :
- CITY : _____ STATE : __ ZIP :
- *CLLI (Obtained from Telcordia) :
- *PSEUDO CLLI (required if CLEC switch is not in this LATA) :
- POINT CODE (Obtained from Telcordia) :
- SWITCH TYPE :
- *What is your estimated due date of trunk turn up?

NPA-NXX INFORMATION

*CLEC OCN

*LNP Yes No

If LNP is yes please provide LRN numbers below.

NPA-NXX	EFFECTIVE DATE	HOMING TANDEM	LRN
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_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
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MILLI-WATT TEST NUMBER: NPA-NXX-