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JUN 30 1994

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)
Administration of the) CC Docket No. 92-237
North American Numbering Plan) Phases One and Two

**REPLY COMMENTS OF THE
ALLIANCE FOR TELECOMMUNICATIONS INDUSTRY SOLUTIONS**

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**REPLY COMMENTS OF THE
ALLIANCE FOR TELECOMMUNICATIONS INDUSTRY SOLUTIONS**

The Alliance for Telecommunications Industry Solutions ("ATIS") hereby files with the Federal Communications Commission (the "FCC" or the "Commission") these Reply Comments in further response to the Commission's Notice of Proposed Rulemaking ("NPRM"), released on April 4, 1994, with regard to the identification of an appropriate entity to administer, develop and coordinate policy for and resolve disputes relating to the North American Numbering Plan ("NANP").¹ Specifically, ATIS seeks by these Reply Comments to reiterate its willingness to sponsor a numbering organization that would incorporate each of the foregoing functions (hereinafter the World Zone 1 ("WZ 1") numbering organization). ATIS also seeks to clarify specific aspects of its organizational structure and the proposal set forth in its direct comments filed on June 7, 1994, in response to the NPRM, for purposes of addressing and alleviating certain of the concerns raised by others about ATIS' sponsorship of a WZ 1 numbering organization.²

¹ See Administration of the North American Numbering Plan, CC Docket No. 92-237, FCC 94-79 (Adopted: March 30, 1994; Released: April 4, 1994).

² A list of the parties, other than ATIS, filing direct comments are contained in Attachment A. These Reply Comments employ the abbreviations contained in Attachment A in referring to the comments of the parties in this proceeding (e.g., "Comments of Ad Hoc Users, at _____").

In summary, ATIS' direct comments stated that it stands ready to sponsor a WZ 1 numbering organization should it be requested to do so. Specifically, this WZ 1 numbering organization would consist of a committee which would develop and coordinate numbering policy (hereinafter, the "Oversight Committee"), and a neutral, third party NANP administrator who would be selected and guided per the consensus policies of the open, broad-based Oversight Committee. The Oversight Committee would encourage and afford participation by all WZ 1 entities with a direct and material interest in numbering policies and guidelines for NANP administration.

ATIS' direct comments discussed its role as sponsor of a variety of industry committees and forums, that sponsorship role primarily consisting of ensuring that proper procedures are followed for the development of consensus, including strict adherence to principles of openness and due process. The same sponsorship role for a WZ 1 numbering organization is contemplated here. Specifically, ATIS will provide administrative support to the Oversight Committee. The Oversight Committee will select a third-party NANP administrator, subject to the concurrence of the ATIS Board of Directors in its capacity as "holder" of the contract with the third-party administrator. Finally, and most importantly, ATIS, as sponsor, would ensure that the principles of openness and due process are followed. These are the fundamental aspects of sponsorship which ATIS has performed for its industry committees in the past and would propose to continue herein.

ATIS' direct comments also recognized the complexity and the sometimes contentious nature of numbering policy issues and thus, the importance of a timely dispute resolution process. The importance of dispute resolution to the overall success of the consensus process as well as the difficulty within the industry in reaching agreement on what the dispute resolution process

should be, was emphasized. In this regard, ATIS stated that FCC direction and decision as to a timely dispute resolution mechanism, process, and procedure is a prerequisite essential to the sponsorship of a WZ 1 numbering organization by ATIS and establishment of an Oversight Committee on numbering policy.

With regard to the selection of a neutral, third-party NANP administrator, ATIS indicated that the Oversight Committee would develop the selection criteria, and procedures, and ultimately, select the NANP administrator, for concurrence by the ATIS Board of Directors, the goal being an open and fair process, based on industry consensus.

Finally, ATIS submitted that any funding mechanism should support both the policy development and the number administration functions of an industry-sponsored effort. ATIS maintained that there should be full and timely recovery of costs associated with both the policy development and the administration of the NANP, and the cost recovery mechanism should be established with sufficient industry consensus and regulatory support to avoid protracted and counterproductive contentiousness.

STATEMENT

As a broad cross section of the direct comments in this proceeding have indicated, and as the FCC itself has noted, "adequate telephone numbers, available through a uniform numbering plan, are essential to provide efficient access to new services and technologies and to support continued economic growth."³ The telecommunications industry's interest, and most importantly, the public interest, would be served by establishing an open, industry-based consensus forum for the development and coordination of numbering policy to ensure this goal is achieved. An open

³ See NPRM, at ¶ 2 and e.g., comments of APC, at 5; comments of GTE, at 3; and comments of Stentor, at 2.

Oversight Committee as suggested by ATIS is intended to provide such a forum built on consensus and due process.

In this regard, ATIS acknowledges the support expressed in direct comments submitted in response to the NPRM in connection with it serving as the sponsor for an Oversight Committee open to the industry and all interested parties.⁴ For the reasons set forth in its original comments to the NPRM, ATIS submits that if it were requested to undertake a sponsorship role by the Commission, it would fill this sponsorship role in a manner that would ensure that the Oversight Committee in its own operations, and in its direction of a third-party NANP Administrator, functions consistent with the principles of openness and due process. In this regard, ATIS has ten years of history and experience in sponsoring a number of industry committees and forums created for the purpose of reaching consensus resolutions on important, complex, and often contentious telecommunications issues.⁵ Based on this experience, it is both reasonable and appropriate for ATIS to offer this same kind of assistance again for sponsorship of an open, industry Oversight Committee.

There appears to be some misunderstanding and some concern about certain aspects of ATIS' proposed sponsorship role. It is important that ATIS' role as a proposed sponsor and what that role contemplates be fully understood. Specifically, sponsorship of an Oversight Committee by ATIS has raised concerns about the following: ATIS membership; the relationship between ATIS and its Board of Directors, and the sponsored committees; and the consensus resolution

⁴ See generally comments of APC, Bell Atlantic, BellSouth, CBT, GTE, MCI, NYNEX, OPASTCO, Pacific Bell and Nevada Bell, PCIA, Rock Hill/Fort Mills/Lancaster Telephone Companies, SBC, Sprint, Stentor, Telco Planning, USTA, and U S WEST.

⁵ See comments of ATIS, at 2-3.

process as employed by the industry committees. As previously stated, ATIS sees its role as sponsor being threefold: 1) providing administrative support to the open Oversight Committee; 2) reviewing the selection of the NANP administrator by the Oversight Committee for Board of Directors' concurrence; and 3) ensuring that the important and fundamental principles of openness and due process are followed.

The Oversight Committee would have self-governing mechanisms that would allow interested entities a full opportunity to be heard and would ensure that all decisions made either in the Oversight Committee or by the NANP administrator are pursuant to the principles of openness and due process. Appropriate appeals mechanisms and timely dispute resolution mechanisms would also be in place. The industry itself via the Oversight Committee will develop the details of these self-governing mechanisms, procedures and the operations of an industry numbering forum.

Several commenters have expressed the concern that ATIS' history as an exchange carrier organization still leaves it subject to the appearance of local exchange carrier ("LEC") dominance and influence, thereby rendering it the wrong candidate to fulfill the relatively simple and straightforward sponsorship function for the proposed Oversight Committee and the selection of a third-party NANP.⁶

The role of the former Exchange Carriers Standards Association ("ECSA") was by and large, to sponsor industry activities, supporting openness, due process, and certain fundamental

⁶ See comments of Ad Hoc Committee, at 5; comments of Airtouch, at 4-5; comments of Allnet, at 7; comments of CTIA, at 3-4; comments of McCaw, at 3, fn. 6; comments of MFS, at 3; comments of Teleaccess, at 3-4; and comments of Vanguard, at 10.

operating principles for each of the committees.⁷ ECSA also provided certain administrative support to the committees' activities. The sponsorship role as it has been carried out historically and as is proposed herein for the Oversight Committee is hardly one that affords opportunity to exert dominance or influence in committee deliberations. Neither the ECSA membership nor its Board had or attempted to have any direct influence or control over the consensus resolutions and decisions reached by the sponsored committees. Participation in the sponsored committees has always been open to all interested parties, not just a single industry segment. And the sponsorship role has always been one of limited and refrained ECSA involvement.

Moreover, the perceptions that there were opportunities for the LECs to dominate and influence ECSA-sponsored activities should be even further dispelled with the expansion of ATIS' (formerly ECSA's) membership and its Board of Directors.⁸ In its former structure as the ECSA, membership was open to wireline exchange carriers, and the Board of Directors comprised twenty one (21) exchange carriers. Now, ATIS membership is open to all domestic providers of telecommunications services with a plant investment in transport and/or switching equipment.⁹ ATIS membership, which numbers one hundred and forty (140), represents the various segments of the U.S. telecommunications industry including exchange carriers, interexchange carriers, competitive access providers, cellular carriers, personal communications services providers and others; and its expanded twenty-seven (27) member Board of Directors

⁷ See comments of ATIS, at 6.

⁸ ECSA formally announced its new identity as ATIS and expanded its membership in 1993. The first meeting of the expanded ATIS Board of Directors was held in February 1994.

⁹ See comments of ATIS, at 2.

represents a much broader range of industry interests.¹⁰

The intent of this expansion (which is ongoing) is to reflect the rapidly expanding telecommunications industry and the myriad of new players amongst its ranks. It is also intended to more closely reflect the open, broad-based industry committees that it has sponsored for over ten (10) years. Thus, while ATIS' membership may now more appropriately reflect what is occurring within the telecommunications industry, its role as respects sponsorship of industry committees, including a proposed Oversight Committee, will remain the same -- to provide the necessary administrative support and ensure that the fundamental principles attendant with openness and due process are observed.

As such, the proposed WZ 1 numbering organization, and its relationship to the ATIS membership and its Board of Directors, would be consistent with that of the other industry committees presently sponsored by ATIS.¹¹ ATIS believes this sponsorship role for the Oversight Committee is both well defined and limited, responding to these stated concerns about ATIS' history and its potential ability to possibly influence deliberations on numbering.

With regard to the ATIS proposal on NANP administration, ATIS also observes that some commenters have misunderstood or confused the role of ATIS in relation to administration of the NANP. At the outset, it should be made clear that ATIS does not propose that it act as the

¹⁰ A list of the ATIS member companies and the ATIS Board of Director member companies are contained in Attachment B.

¹¹ As stated in its direct comments, ATIS sponsors accredited standards Committee T1; the Carrier Liaison Committee, including the Network Operations Forum, the Industry Carriers Compatibility Forum, the Ordering and Billing Forum, the Toll Fraud Prevention Committee, the Ad Hoc 800 Database Committee and the Industry Numbering Committee; the Information Industry Liaison Committee; the Telecommunications Industry Forum; the Protection Engineers Group; Standards Committee 05; the Electronic Communications Service Provider Committee; and the Network Reliability Steering Committee.

NANP administrator. Nor is it contemplated that the ATIS Board of Directors control the Administrator's actions or decisions. Rather, the Oversight Committee would develop the selection criteria (e.g., capability, experience, quality, etc.) and the selection procedure, and ultimately make the selection of the NANP administrator itself, subject to concurrence by the ATIS Board of Directors in its capacity as "holder" of the contract with the third-party administrator. The third party NANP administrator would conduct the day-to-day activities of the NANP and be directed by the Oversight Committee-developed and approved guidelines. At the same time, the NANP Administrator would remain independent and responsible for its own staff, management, budget and administration.¹²

Thus, the role of ATIS, its membership, and the relationship it would have with an Oversight Committee should be further clarified. ATIS' proposal is designed to facilitate the development and coordination of numbering policy consistent with the principles of openness and due process, and to have the industry, via the Oversight Committee, select a neutral, third party NANP administrator who would be guided per the consensus policies developed by the Oversight Committee. With the expansion of its membership and its Board of Directors to include a wider representation of industry interests, ATIS could not achieve such influence or control to produce results that would favor one segment of the industry over another. In short, ATIS is interested in lending its expertise with administrative support, and its experience with open and fair consensus procedures to fulfill the well defined and delineated role of sponsor.

ATIS also notes several comments related to the consensus resolution process, specifically the process used by its current sponsored committees and suggested for the Oversight Committee.

¹² See comments of ATIS, at 10-11.

The commenters focused on the process's perceived slowness and the need for improvement.¹³ Consensus, as used in the industry committees, is achieved when substantial agreement has been reached among the participants. Substantial agreement means more than a simple majority, but not necessarily unanimity. The consensus process is to be free from industry segment dominance and requires that all views and objections be considered. It requires a concerted effort be made toward resolution.

Depending on the nature of the issue being addressed, the consensus process can produce prompt results. On more complex and contentious issues, reaching consensus may take longer. In certain limited instances, there may be no substantial agreement reached among the participants. In this regard, ATIS believes it is important to differentiate between those issues which require establishment of new numbering policy, and thus, may take longer to deliberate and ultimately reach consensus, from those issues which relate to administration of that policy.

In ECSA's and now ATIS' history of sponsoring industry-wide consensus resolution committees, thousands of issues, ranging from those requiring a simple "fix" to the most complicated technical resolutions and standards development have been resolved by consensus.¹⁴ While ATIS understands that there are certain concerns related to the process's pace, ATIS believes that there is a long and substantial record of successes which support continued use of the consensus process as a viable means by which to reach resolutions. In those limited instances where consensus cannot be reached, some value is still achieved. The industry participants have

¹³ See comments of Airtouch, at 7; comments of Allnet, at 2 and at 7; comments of CSCN, at 2; comments of MFS, at 3; and comments of Sprint, at 7.

¹⁴ For example, the Carrier Liaison Committee's Ordering and Billing Forum has resolved 938 issues, and the ATIS-sponsored Committee T1 has developed 140 American National Standards.

had an opportunity to air their positions, share important information, and sharpen the focus and discussion of the issues. ATIS suggests that alternative processes, whether they be regulatory, legislative, or judicial raise at least the same concerns and often present more significant drawbacks.

With regard to a funding mechanism, ATIS reiterates its support for the principle that any funding mechanism that is adopted to support a WZ 1 numbering organization should generate revenues on a fair and equitable basis and should support both the policy development and the number administration functions of the new organization. No discernible objections to this principle were presented in response to the NPRM. As stated in its direct comments,¹⁵ full and timely recovery of costs is an important factor in ATIS' willingness to sponsor a WZ 1 numbering organization.

CONCLUSION

For the foregoing reasons, ATIS respectfully reiterates that, if designated, it would be willing to sponsor a WZ 1 numbering organization as described in its original comments and as further explained herein.

Respectfully submitted,

ALLIANCE FOR TELECOMMUNICATIONS
INDUSTRY SOLUTIONS

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¹⁵ See comments of ATIS, at 11.

ATTACHMENT A

Comments Filed in CC Docket No. 92-237, Phases One and Two on June 7, 1994

AD HOC TELECOMMUNICATIONS USERS ASSOCIATION ("Ad Hoc Committee")
AIRTOUCH COMMUNICATIONS ("Airtouch")
ALLNET COMMUNICATIONS ("Allnet")
AMERICAN MOBILE TELECOMMUNICATIONS ASSOCIATION ("AMTA")
AMERICAN PERSONAL COMMUNICATIONS ("APC")
AMERICAN PETROLEUM INSTITUTE ("API")
AMERICAN PUBLIC COMMUNICATIONS COUNCIL ("APCC")
AMERITECH
ASSOCIATION FOR LOCAL TELECOMMUNICATIONS SERVICES ("ALTS")
AT&T CORP ("AT&T")
BELL ATLANTIC
BELLCORE
BELLSOUTH TELECOMMUNICATIONS, INC. ("BellSouth")
CANADIAN STEERING COMMITTEE ON NUMBERING ("CSCN")
CATHEY, HUTTON & ASSOCIATES, INC. ("CHA")
CINCINNATI BELL TELEPHONE COMPANY ("CBT")
COMMUNICATIONS MANAGERS ASSOCIATION ("CMA")
COMPETITIVE TELECOMMUNICATIONS ASSOCIATION ("COMPTEL")
CELLULAR TELECOMMUNICATIONS INDUSTRY ASSOCIATION ("CTIA")
DEAN BROTHERS PUBLISHING ("Dean Brothers")
GTE SERVICE CORPORATION ("GTE")
GVNW INC./MANAGEMENT ("GVNW")
LCI INTERNATIONAL TELECOM CORP ("LCI")
MCCAW CELLULAR COMMUNICATIONS, INC. ("McCaw")
MCI TELECOMMUNICATIONS CORPORATION ("MCI")
MFS COMMUNICATIONS COMPANY, INC. ("MFS")
MISSOURI PUBLIC SERVICE COMMISSION ("MoPSC")
NATIONAL ASSOCIATION OF REGULATORY UTILITY COMMISSIONERS ("NARUC")
NATIONAL COMMUNICATIONS SYSTEM ("NCS")
NATIONAL EXCHANGE CARRIER ASSOCIATION, INC. ("NECA")
NEXTEL COMMUNICATIONS, INC. ("NEXTEL")
NORTH AMERICAN TELECOMMUNICATIONS ASSOCIATION ("NATA")
NYNEX
ORGANIZATION FOR THE PROTECTION AND ADVANCEMENT OF SMALL
TELEPHONE COMPANIES ("OPASTCO")
PACIFIC BELL/NEVADA BELL
PERSONAL COMMUNICATIONS INDUSTRY ASSOCIATION ("PCIA")
ROCK HILL, FORT MILLS & LANCASTER TEL COS.
SPRINT CORPORATION ("Sprint")
STENTOR RESOURCE CENTER INC. ("Stentor")

ATTACHMENT A

SOUTHWESTERN BELL CORPORATION ("SBC")
TELACCESS
TELCO PLANNING, INC.
TELECOMMUNICATIONS RESELLERS ASSOCIATION ("TRA")
TELEPORT COMMUNICATIONS GROUP, INC. ("TCG")
U S WEST
UNITED STATES TELEPHONE ASSOCIATION ("USTA")
VANGUARD CELLULAR SYSTEM, INC. ("Vanguard")
VARTEC TELECOM ("VarTec")

ATIS MEMBER COMPANIES

3 Rivers Telephone Coop
ALLTEL
AT&T Communications
American PCS, L.P.
Ameritech Services
Amherst Telephone Co
Amtelco
Anchorage Telephone Utility
Arctic Slope Tel Assoc. Coop.
Armstrong Telephone Co
BRUCE TELEPHONE CO.
Barry County Telephone Company
Bell Atlantic
BellSouth
Bentleyville Telephone Co.
Big Bend Telephone Co
Bridge Water Telephone Co.
Brindlee Mountain Telephone Co
Brookings Municipal Telephone
Buffalo Valley Telephone Co.
C-TEC
CAMERON TELEPHONE
Cellular, Inc.
Central State Telephone Co.
Century Telephone
Chequamegon Telephone Coop
Chester Telephone Co
Chibardun Tel. Cooperative
Chillicothe Telephone Co.
Chippewa County Telephone Co.
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Citizens Telco Of Brevard
Citizens Telco Of Higginsville

Citizens Telco Of Kecksburg
Citizens Utilities Co.
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Community Service Communications
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Conestoga Tel. & Telegraph Co.
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Dakota Coop Telecomm
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Dial Page
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East Otter Tail Telephone Co.
Eastex Telephone Coop.
Egyptian Telephone Coop. Assn.
Elkhart Telephone Co
Ellensburg Telephone Co
Empire Telephone Corp
Farmers Tele. Coop., Inc.
Fort Mill Telephone Co
GTE Telephone Operations
Geneseo Telephone Co
Grand River Mutual Tel Corp.
Granite State Telephone
Guam Telephone Authority
Gulf Telephone Co
Hawkinsville Telephone Co.
Hiawatha Telephone Co
Home Telephone Co
Horry Tel Coop
Illinois Consolidated Tel. Co.

Indianhead Telephone Co.
Interstate Telecom. Coop.
Ironton Telephone Co.
Jefferson Telephone Co.
Kalama Telephone Co.
Kansas City Star
Lancaster Telephone Co.
Lexington Telephone Co.
Lincoln Telephone Co.
Lincolnvile Telephone Co.
Lufkin-Conroe Tel.
MCI
MFS Communications Co.
MIDCO Communications
Mankato Citizens Telephone Co.
Marianna & Scenery Hill Tel
Mashell Telephone Co
Merrimack County Telephone Co.
Mid-Plains Telephone
Moapa Valley Telephone Co.
Moundville Telephone Co.
NYNEX
Nebraska Central Telephone Co.
Nemont Tel Coop.
Niagara Telephone Co.
North Pittsburgh Telephone Co.
North-Eastern Pa Tel Co
Northeast Missouri Rural Tel.
Northern Arkansas Tel Co.
Orwell Telephone Co.
Otz Tele. Coop
Pacific Bell
Pacific Telecom
Panhandle Telephone Coop.

Pigeon Tele. Co.
Pioneer Tele. Co.
Pond Branch Telephone Co.
Public Service Telephone Co.
Puerto Rico Telephone
Rochester Telephone
Rock Hill Telephone
Roseville Telephone
Shenandoah Telephone Co.
Southern New England Tel.
Southwestern Bell
Sprint Corp.
Standard Telephone Co.
State Long Distance Tel Co.
Stayton Cooperative Tel Co.
Steelville Telephone Exchange
Taconic Telephone Corp.
Telalaska
Telephone & Data Sys.
Telephone Svs. Co.
Teleport Communications Group
Time Warner Communications
Township Telephone Co
Tri-County Telephone Co.
Twin Lakes Telephone Coop Corp
U S West
UTELCO
United Telephone Mutl Aid Corp
Utilities Inc
Vanguard Cellular Sys.
Volcano Telephone Co.
W Carolina Rural Tel Coop
West Tennessee Telephone Co.
Western New Mexico Tel Co

Wiltel

Wood County Telephone Co.

XIT Rural Telephone Coop

Yeoman Telephone Co.

ATIS BOARD OF DIRECTORS MEMBER COMPANIES

| | |
|------------------------------------|--|
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| American Telephone & Telegraph | Pacific Bell |
| Ameritech Services | Puerto Rico Telephone |
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| BellSouth Telecommunciations | Roseville Telephone Company |
| Century Telephone Enterprises Inc. | Southern New England Telephone Company |
| Cincinnati Bell Telephone | Southwestern Bell Telephone |
| Citizens Telephone Company | Sprint Corporation |
| Concord Telephone Company | Standard Telephone Company |
| Elkhart Telephone Company | Teleport Communications Group |
| GTE Corporation | US WEST |
| MCI Communications | WilTel |
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| North Pittsburgh Systems, Inc. | |
| NYNEX | |

Certificate of Service

I, Vermel Allen, hereby certify that a copy of the foregoing "Reply Comments of the Alliance for Telecommunications Industry Solutions" for the North American Numbering Plan, in CC Docket No. 92-237 (Phases I and II), have been sent on this 30th day of June, 1994, by First Class United States Mail, postage prepaid, to the below-listed parties:

A handwritten signature in cursive script that reads "Vermel Allen". The signature is written in black ink and is positioned above a solid horizontal line.

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