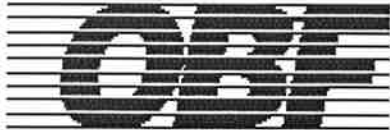


Alliance for Telecommunications
Industry Solutions

Sponsor of the



Ordering and Billing
Forum

A Forum of the Carrier Liaison
Committee

1200 G Street NW
Suite 500
Washington DC 20005

202-628-6380
Fax: 202-393-5453
E-mail: obf@atis.org

Martha Huizenga
Moderator

Mike Norris
Assistant Moderator

Susan Miller
President & CEO
ATIS

John Pautlitz
Director, Industry Forums
ATIS

Heike Martin
OBF Administrator
ATIS

September 19, 2002

Mr. William Maher
Chief
Wireline Competition Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: 855 Easily Recognizable Code ("ERC"), CC Docket 95-155

Dear Mr. Maher:

The purpose of this letter is to advise the Federal Communications Commission ("Commission" or "FCC") of the current circumstances of many Responsible Organizations ("Resp Orgs") regarding customer requests for reservations in the 855 ERC, and to request the Commission's assistance in the form of a written communiqué supporting the industry's release of those requests. Due to the Commission's indefinite delay of the 855 ERC opening on November 17, 2000¹, Resp Orgs have been holding customer requests, in some cases, for over 36 months. This extended period of time has contributed to customer confusion and several other issues identified in more detail below. The Alliance for Telecommunications Industry Solutions' ("ATIS") Ordering and Billing Forum ("OBF") SMS/800 Number Administration Committee ("SNAC") believes that the best course of action is to allow Resp Orgs to release customer requests for 855 reservations and to accept requests again, if, and when, the Commission has lifted the delay and a new release schedule has been established by the industry.

The 855 ERC was originally scheduled to be opened on April 8, 2000, shortly after the opening of the 866 ERC. However, the Commission delayed opening the 855 ERC, at the request of the SNAC, until November 18, 2000 due to potential problems with the first-come, first-serve functionality of the SMS/800 system.² After the FCC determined the new opening date for the 855 ERC, Resp Orgs began accepting customer requests for 855 toll free numbers accordingly.

On November 17, 2000, the Commission delayed indefinitely the 855 ERC opening.³ If the Commission decides to open the 855 ERC, the

¹ Letter from L. Charles Keller, Chief, Network Services Division, Federal Communications Commission, to Michael Wade, President, Database Services Management, Inc., dated November 17, 2000.

² Letter from Ronald D. Havens, OBF Moderator, to L. Charles Keller, Chief, Network Services Division, Common Carrier Bureau, dated March 16, 2000; and Letter from Ronald D. Havens, OBF Moderator, to L. Charles Keller, Chief, Network Services Division, Common Carrier Bureau, dated June 5, 2000.

³ Letter from L. Charles Keller, Chief, Network Services Division, Federal Communications Commission, to Michael Wade, President, Database Services Management, Inc., dated November 17, 2000.

SNAC has requested that the Commission allow the industry to determine the new release date, as was done previously with 800, 888, 877 and 866 ERCs, in order to ensure a successful code implementation.⁴ To this date, the Commission has not commented further on the 855 ERC opening.

As previously stated, the SNAC believes that the best course of action is to allow Resp Orgs to release customer requests for 855 reservations and to accept requests again, if, and when, the Commission has lifted the delay and a new release schedule has been established by the industry. The Resp Orgs have been holding customer requests for a lengthy period of time. Therefore, customer contact information may be outdated in many instances. A customer may have determined, for business and other reasons, that it no longer wants a requested number without notifying the Resp Org. Furthermore, the customer may have gone out of business. Under these scenarios, it would be extremely labor intensive, as well as cost and time prohibitive, for a Resp Org to ensure that it has the proper customer contact information for each request it has received.

Accordingly, the SNAC is requesting the assistance of the Commission through the issuance of the appropriate communication indicating that Resp Orgs may appropriately release customer requests for 855 ERC reservations. While the SNAC does not believe there is an explicit requirement on the Resp Orgs to maintain the 855 ERC customer requests, the group would feel more comfortable proceeding with the Commissions' acknowledgement, given the responsibility of ensuring a first-come, first-serve scenario for all code openings.

Should you have any questions regarding this matter, please contact the OBF SNAC Co-Leaders, Cynthia Benton, WorldCom, at (210) 484-2328 or via email: cynthia.benton@wcom.com, or Chris Rugh, Worldwide Telegraph, at (877) 272-2576 or via email: chris@worldwidetelegraph.com.

Thank you for your attention to this matter.

Sincerely,



Martha Huizenga
OBF Moderator

cc: Eric Einhorn, Acting Chief, TAPD, WCB
Diane Griffin, Assistant Chief, WCB
Cheryl Callahan, Assistant Chief, TAPD, WCB
Jennifer Gorny, Staff Attorney, TAPD, WCB
Mike Norris, OBF Assistant Moderator
Cynthia Benton, SNAC Co-Leader
Chris Rugh, SNAC Co-Leader
Megan Campbell, ATIS General Counsel
John Pautlitz, ATIS Director – Industry Forums
Deseree Herring, SNAC Administrator

⁴ Letter from Stephanie Cowart, OBF Moderator, to Diane Harmon, Deputy Division Chief, Network Services Division, Common Carrier Bureau, dated March 23, 2001.