June 24, 2002

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW, Room TW-A325
Washington, DC 20554

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

Dear Ms. Dortch:

On June 21, 2002, representatives from the Industry Numbering Committee ("INC"), a committee sponsored by the Alliance for Telecommunications Industry Solutions, met with representatives from the Federal Communications Commission ("FCC" or "Commission") to discuss the INC correspondence to Dorothy Attwood, Chief, Wireline Competition Bureau, dated May 21, 2002 ("Letter" or "INC Letter"). In attendance, representing the Commission, were Diane Griffin, Assistant Chief, WCB, via conference bridge; Sanford Williams, Designated Federal Officer, NANC; Jennifer Gorny, Assistant Designated Federal Officer, NANC; and Cheryl Callahan, Assistant Division Chief, TAPD, WCB. The individuals representing the INC were Rose Travers, USTA, INC Assistant Moderator; John Colombo, Verizon, LNPA Co-Chair; Julie Petersen, SBC, INC Representative; Alissa Medley, ATIS/INC Committee Administrator; and Megan Campbell, ATIS General Counsel.

The purpose of the meeting was to discuss the INC Letter. The INC Letter discussed the INC issue resolution process and the current Pooling Administrator’s timeline for identifying system impacts or change orders resulting from INC issue resolutions. The INC provided several suggestions as to how the INC and the PA could align their processes to allow for a more efficient use of resources. A thorough explanation of the process observed currently and the INC’s recommendations are found in the attached presentation that was distributed during the meeting.
Pursuant to the Commission’s rules, I am filing one electronic copy of this notice of ex parte and request that you place it in the record of the proceedings. Please contact me at 202/434-8847 if you have any questions or comments.

Sincerely,

Megan L. Campbell
General Counsel

Attachment

cc: Robert Atkinson, NANC Chair (rca53@columbia.edu)
Sanford Williams, NANC DFO, Staff Attorney, TAPD, WCB (swilliam@fcc.gov)
Jennifer Gorny, NANC ADFO, Staff Attorney, TAPD, WCB (jgorny@fcc.gov)
Cheryl Callahan, Assistant Division Chief, TAPD, WCB (ccallaha@fcc.gov)
Mark Oakey, Contracting Officer, FCC Contracts and Purchasing Center
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David Bench, Nortel Networks, INC Moderator (dbench@nortelnetworks.com)
Rose Travers, USTA, INC Assistant Moderator (rtravers@usta.org)
John Colombo, Verizon, LNPA Co-Chair (john.l.colombo@verizon.com)
Julie Petersen, SBC, INC Representative (jp4746@sbc.com)
Jean-Paul Emard, ATIS Director - Industry Forums (jemard@atis.org)
Alissa Medley, ATIS/INC Committee Administrator (amedley@atis.org)
Goals of Today’s Meeting

• Gain mutual understanding of the process now in place
  – INC issue process
  – PA change order process
  – Interaction between the two
• Identify problem areas
• Discuss INC recommendations
• Address a path forward
Background

- INC established in 1993 to develop and maintain national guidelines on number administration.
- INC provides a forum for industry and affected parties to discuss and resolve technical issues through due process.
- Regulatory mandates have consistently been incorporated into the INC Guidelines.
- Technical industry improvements to the Guidelines are vetted through the INC consensus process.
- With advent of pooling and the PA contractual relationship, INC guideline improvements have been delayed due to: 1) Change Order process; and 2) unknown cost impacts.

Current Working Environment

- Typical lifecycle of an INC issue
  - Time period from acceptance to initial closure can be as short as 1 day if issue is not controversial
  - Minimum 21 calendar days; on average 48 days
  - PA has 30 days from date of publication of INC guidelines to issue change order with detailed impacts
  - FCC has 45 days from receipt of Change Order to render decision back to PA
Problems With Change Order Process

- The recent change order process has had problematic effect on working issues effectively:
  - During issue discussions, INC members struggle with their opinions and options given the absence of any relative cost information and the “uncertainty” of a potential change order.
  - INC does not discuss pricing, market allocation, etc., in accordance with antitrust laws but relative costs relating to the resolution of technical issues are necessary; difficult for members to ignore the current “one-for-one” relationship between an issue resolution and its corresponding price tag (Change Order).
- INC is not opposed to the PA requesting additional funds via Change Orders as necessary, but INC would like to have at least some relative cost information available during issue discussion to understand the financial impacts of technically feasible alternatives. Why?

An Illustrative Example

- With relative cost information, INC feels that it could make better, more informed decisions during the issue resolution process, especially when several alternatives may be available.
- To illustrate:
  - Issue 365 was introduced in order to overturn a previously accepted resolution related to the closure of Issue 312, which impacted the guidelines.
  - With the industry's knowledge and experience of Change Orders (#s 4 & 5) that were created subsequent to Issue 312 going to Final Closure, the INC successfully worked, in conjunction with interactive PA guidance, and closed Issue 365 at the satisfaction of the issue contributor, solving the original problem.
- If PA impact analysis was available during discussion of Issue 312, the INC would have come to the better resolution and two change orders would never have had to be written.
Problem Depicted

- Re-work, e.g., Issue 365, should not be part of the normal INC process to resolve issues.

Planning for the Future...

- INC seeks an understanding of the permissive vs. restrictive nature of the PA contract to better facilitate pooling administration improvements for both the PA and industry. This only pertains to issue management at INC, not to other aspects of PA contract.

- Improve efficiency by introducing: a) an up-front “analysis” when PA submits issues, b) a “draft” release of change order, and c) use of scheduled PAS updates.

- Is there a way for INC to be notified when a decision is made on those change orders based on INC issues?

- INC desires a cooperative working relationship with the PA (and NANPA). The respective roles are intertwined, and the advent of PAS (and CAS) definitely has altered the way all parties now manage their work.
Possible Timeline for Consideration

- Issue Presented
- Issue Accepted
- Initial Closure
- Final Closure
- Publication of INC Guidelines
- PA Change Order Listing
- FCC Decision on Change Order

- Time period from acceptance to initial closure can be as short as 1 day if issue is not controversial.
- Minimum 21 calendar days; on average 48 days.
- PA has 30 days from date of publication of INC guidelines to issue change order with detailed impacts.
- FCC has 45 days from receipt of Change Order to render decision back to PA.
- Suggestion: PA "draft" change order between initial and final closure.
- Suggestion: If presented by PA, include impact analysis.
- Suggestion: INC may defer implementation of resolution until a scheduled PAS update.
- Suggestion: INC may defer implementation of resolution until a scheduled PAS update. PA submits "official" change order.
- Suggestion: INC notified of FCC's change order decision and takes appropriate measures.
- Suggestion: INC may defer implementation until a scheduled PAS update.

Further Information

Please contact:

Jean-Paul Emard, Director of Industry Forums
202-434-8824, j pemard@atis.org

Alissa Medley, INC Committee Administrator
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Or visit the INC website:
http://www.atis.org/atis/clc/inc/inchom.htm