

September 14, 1995

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FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C.

**Alliance for Telecommunications  
Industry Solutions**

*Problem Solvers to the  
Telecommunications Industry*

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ATIS

**Mr. William Caton, Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Room 222  
Washington, DC 20554**

**Re: Nomination to the North American Numbering Council**

**Dear Mr. Caton:**

On August 9, 1995, the Federal Communications Commission ("FCC" or "Commission") released a public notice in CC Docket No. 92-237 requesting nominations for membership on the North American Numbering Council ("NANC"), a Federal Advisory Committee to be established to advise the FCC on numbering issues and select a neutral North American Numbering Plan ("NANP") Administrator as well as resolve issues in the administration of the NANP, and conduct dispute resolution regarding numbering matters. The Alliance for Telecommunications Industry Solutions ("ATIS") is applying for membership on the NANC and designates Susan M. Miller, Vice President and General Counsel, as its representative. Ms. Miller is authorized to represent ATIS on this matter.

ATIS membership is open to all domestic providers of telecommunications services with a plant investment in transport and/or switching equipment. ATIS actively promotes the timely resolution of national and international issues involving telecommunications standards and the development of operational guidelines. To accomplish this mission, ATIS initiates and maintains open industry forums whereby local exchange carriers, interexchange carriers, cellular carriers, competitive access providers, PCS providers, manufacturers, cable companies, regulatory agencies, including federal, state, and Canadian agencies as well as Canadian and Caribbean service providers gather to address and resolve industry-wide issues. There has also been international participation from various industry segments and industry standards developing organizations.

**COMMITTEES**

Committee T-1  
Telecommunications

Carrier Liaison Committee

Telecommunications  
Industry Forum

Information Industry  
Liaison Committee

Protection Engineers Group

Standards Committee 05

Electronic Communications  
Service Provider Committee

Network Reliability  
Steering Committee

ATIS sponsors a number of industry forums which address technical and/or operational issues concerning numbering, dialing and the planning and administration of the NANP. A significant role has been played by the Industry Numbering Committee ("INC"), a committee residing under the Industry Carriers Compatibility Forum of ATIS's Carrier Liaison Committee. It is the primary vehicle used by the industry to address and resolve issues by consensus associated with the planning, administration, allocation, assignment and use of numbering resources and related dialing considerations of public telecommunications within the NANP. INC has published such guidelines as *"INC Report on PCS N00 Portability" (INC 95-0512-010)*<sup>1</sup>; *Central Office Code Assignment Guidelines*; *Personal Communications Services N00 NXX Code Assignment Guidelines*; *555 NXX Assignment Guidelines and NPA Code Relief Planning Guidelines*. The INC is also the place where the current NANP Administrator has turned when issues arise with respect to the assignment of numbering resources. The NANP Administrator has sought and continues to seek guidance and direction from the industry on complex numbering issues via the INC.

Numbering issues regarding toll free resources are also being addressed in the Service Management System ("SMS") Number Administration Committee ("SNAC"). The Information Industry Liaison Committee ("IILC") has also addressed the issue of abbreviated dialing.

ATIS seeks membership on the NANC because of its history in addressing and resolving complex numbering and dialing issues via an industry consensus resolution process. As a member of the NANC, ATIS would represent the guidelines and resolutions developed by the industry, bringing with it expertise on a significant body of work concerning numbering and the process by which these resolutions were and continue to be accomplished. This body of work is important in that it represents the processes by which current numbering resources are being allocated. In addition, the future of numbering and the issues associated with it as well as the administration of numbering resources are likely to build off this

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<sup>1</sup> This report was referenced in CC Docket No. 95-116, "Telephone Number Portability," Notice of Proposed Rulemaking, specifically requesting comments on the proposed architectures and call through scenarios set forth in the report.



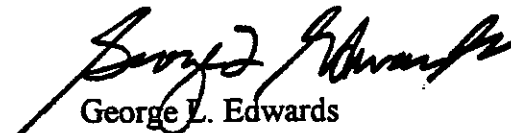
extensive foundation of industry accomplishments. ATIS is the source of information for these important industry achievements.

ATIS is committed to the success of the North American Numbering Council and will actively participate in the activities of the Council to support the attainment of its goals.

The ATIS nominee, Susan M. Miller can be reached at the Alliance for Telecommunications Industry Solutions, 1200 G Street, N.W., Suite 500, Washington, D.C. 20005, Phone: (202) 434-8828, Fax: (202) 393-5453, e-mail: susan.miller@t1.org.

If there are any questions with regard to this nomination, please contact me at (202) 434-8820.

Sincerely,

  
George L. Edwards  
ATIS President