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April 4, 2014

**Via Email**

Henning Schulzrinne  
Chief Technology Officer  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Re: *Ex Parte*, FCC Numbering Testbed Workshop, WC Docket No. 13-97

Dear Dr. Schulzrinne:

Congratulations on a successful Numbering Test Bed Workshop. Clearly, as demonstrated by the attendance and level of energy in the room, there is a lot of interest in this issue. As I noted during the Workshop, common reference points need to be identified to effectively compare the proposals and outputs related to the Numbering Testbeds. ATIS proposes that these reference points be created during the development of technical requirements for the Testbeds.

During the discussion at the Workshop, terms such as “registrar,” “registry,” and “metadata” were used by multiple participants, but it seemed that these terms were used in slightly different contexts and with slightly different meanings depending on which participant was speaking. Other terms such as “registrant” and “user” emerged as part of the discussion. These terms are very broad and may be used inconsistently and therefore cause confusion.

ATIS proposes that, for each Testbed, the stakeholders involved in the Testbed should define specific functions and relate these to a common reference model so that there is a clear understanding of what functions are provided and where. By developing these common reference points, each Testbed can be more easily evaluated against a common set of scenarios.

ATIS believes that the common reference points should include the following items:

1. Definition of Functional Elements (Registrant, Registrar, Registry, End User, ENUM/DNS).
2. Reference Architecture showing the interaction of the functional elements (Note: Different Testbeds may implement these functions in unique ways, but a reference model is needed so that they can be objectively compared).
3. Definition of Metadata (System and User).

4. Requirements regarding handling of Metadata including the impact and open question of CPNI rules. The internet Whois record and carrier CPNI rules are very different.
5. Cryptographic requirements.
6. Porting Use Cases/Scenarios (*e.g.*, *status quo*, state-based rate center consolidation, regional consolidation, asymmetrical porting similar to wireless).

ATIS is volunteering to lead an activity open to all Numbering Testbed(s) participants that would define the above items and produce documented technical requirements.

If there are any questions regarding these matters, please do not hesitate to contact me. A copy of this letter is being submitted on the record of the above-referenced docket.

Sincerely,

/s/

Andrew White  
ATIS Vice President of Technology and Standards

cc: Robert Cannon, Senior Counsel, Office of Strategic Planning and Policy Analysis