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January 31, 2001

Mr. L. Charles Keller, Chief
Network Services Division
Common Carrier Bureau
445 12th Street, SW
Suite 6-A207
Washington, DC 20554

Re: FCC Directive to DSMI regarding the Disconnect and Suspend
Status Functions and the Resulting Telcordia Implementation
Plan

Dear Mr. Keller:

As a supplement to the January 29, 2001 letter from the SMS/800 Number Administration Committee ("SNAC") regarding the above referenced matter (the "January 28 Letter"), the SNAC is providing further justification for the previously requested extension of the proposed February 3, 2001 implementation date. The justification is set forth below in the nature of a generic industry timeline listing the types of activities or events each company, in some manner and combination, will need to complete prior to a successful implementation.

By way of background, the SNAC leadership offered to host a conference call with Commission staff to provide further information and rationale with respect to the positions asserted in the January 28 Letter. The Commission accepted that offer and a call was held yesterday morning, January 30, at 9:30 a.m. EST. The Commission staff participating on that call included: Diane Harmon, Deputy Division Chief, NSD, CCB, Marti Schwimmer, Attorney, NSD, CCB, Jennifer Gorny, Attorney, NSD, CCB, and Les Selzer, Economist, NSD, CCB. Representation from the SNAC included the co-leaders, Pat Parker of Verizon and Leslee Strohm of Qwest and, the SNAC Technical Subteam co-leader, Ron Redfearn of WorldCom. During that call, the Commission staff appeared receptive to the prospect of granting an extension to the February 3, 2001 implementation date but acknowledged that further justification from the industry in the nature of a timeline leading up to a desired implementation would be helpful.

Accordingly, the SNAC leadership took two separate actions. First, a summary of the conference call discussion along with a request for individual companies to submit documentation regarding specific internal timelines was sent to the SNAC list serve. Second, the SNAC held an emergency conference call yesterday afternoon to discuss the possibility of submitting a generic industry timeline. The call generated a high level of interest and resulted in an agreement to submit this letter and the timeline below.

The SNAC is reaffirming its request for a six-month extension of the proposed implementation date. In fact, while going through the exercise of plotting out a timeline it became apparent that a better scenario would provide for a seven-month extension. The SNAC identified three main events on the timeline, those being: (1) delivery of technical and procedural requirements to the Industry; (2) Industry coordinated testing; and (3) implementation.

The timeframe from the delivery of requirements to Industry coordinated testing is estimated to be twelve (12) weeks. During that time, analysis of the requirements, software development and internal testing will take place. The timeframe from Industry coordinated testing to implementation is estimated to be eight to twelve weeks depending on the stability of SMS test regions and the coordination of testing schedules for all RespOrgs. In similar industry testing, the number of MGI Users testing at a given time has been limited to two. Also during this later timeframe, and in parallel to the Industry testing, RespOrgs will need to educate internal departments impacted by the process changes as well as customers. As an example, if the requirements were delivered to the Industry by March 2, 2001, testing could begin on June 1, 2001 with an implementation date set for September 1, 2001. This proposed timeline is consistent with the normal development life cycle for software/system changes resulting, as in this situation, in user impact.

The SNAC is hopeful that the further information provided in this letter assists the Commission in determining an appropriate implementation date. If you should have any questions or concerns regarding this correspondence please call Pat Parker, Verizon, at (972) 615-8384 or Leslee Strohm, Qwest, at (303) 672-1090.

Sincerely,

A handwritten signature in cursive script that reads "Stephanie Cowart".

Stephanie Cowart
OBF Moderator

From: TONI GILBERT
To: lstrohm@uswest.com, pat.parker@verizon.com, ron....
Date: 1/30/01 11:27AM
Subject: IMMEDIATE SNAC ACTION REQUIRED RE: 2/3/01 Implementation Date

DRAFT FOR YOUR IMMEDIATE REVIEW:

To SNAC Participants:

A conference call was held this morning (January 30, 2001) between the FCC and the SNAC Leadership to discuss the January 29, 2001 SNAC letter sent to the Commission. The parties on the call from the FCC included Jennifer Gorny, Les Seltzer, Marty Schwimmer and Diane Harmon. Also attending were Pat Parker, Verizon, SNAC Co-Lead; Leslee Strohm, Qwest, SNAC Co-Lead; and Ron Redfern, WorldCom, Technical Subteam Co-Lead; as well as Megan Campbell, Toni Gilbert and Mike Nichols from ATIS.

The purpose of the call was to discuss the 1/29/01 letter detailing the SNAC's response to the FCC Order (December 6, 2000 Letter to DSMI) regarding the modification of the SMS/800 Disconnect and Suspend Status functions to preclude transfers of toll-free numbers directly between subscribers. Recognizing the limited period of time between receipt of the letter and the scheduled implementation date of Saturday, February 3, 2001, the SNAC requested the conference call with the FCC to explain the rationale and to expand on the positions taken in the letter.

The participants discussed two major issues/concerns:

- the potential for large blocks of numbers to be out of service for unspecified periods of time due to RespOrg or customer error, and
- the need for sufficient time to allow for the incorporation of necessary code changes and processes, as well as testing.

The Commission is receptive to the idea of postponing the implementation date to August 1, 2001 per the SNAC's request. However, they requested the SNAC provide the Commission a timeline detailing the necessary steps that will be taken between now and the proposed implementation date of August 1, 2001. They requested a high level timeline from the industry, as well as a detailed timeline outlining business and technical processes from individual companies that are requesting the extension. The Commission asked that all information, in addition to being appropriately filed with the Commission, be faxed to the attention of Diane Harmon at (202) 418-2345 by close of business tomorrow, January 31, 2001. Please submit the information from your individual companies to the FCC by the required due date. There will be a SNAC Emergency Conference call at 3:00 pm ET today, January 30, 2001, to discuss the industry timeline. Details regarding that call are as follows:

**Call-In Number: (703) 871-3630
PIN: 50975
Conf. #: 4959589**

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