



Alliance for Telecommunications
Industry Solutions

Sponsor of



Toll Fraud Prevention Committee

A forum of the Carrier Liaison Committee

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April 2, 1998

Mr. George L. Edwards
President
ATIS
1200 G Street, N.W., Suite 500
Washington, D.C. 20005

Dear George,

As you are aware, in July 1997, the Network Reliability and Interoperability Council (NRIC) of the Federal Communications Commission (FCC) released its report and recommendations concerning the implementation of Section 256 of the Telecommunications Act of 1996. This report, entitled Network Interoperability: The Key to Competition, described numerous findings of the NRIC and contained a number of recommendations, two of which impacted the Toll Fraud Prevention Committee (TFPC). The purpose of this letter is to report on the activities of the TFPC with regard to these recommendations.

In its report, the NRIC noted that there is an increased potential for intrusion brought about by the implementation of local number portability (LNP). It recommended affected carriers and vendors reinforce their fraud detection and network security capabilities and resources, including participating in the TFPC and other appropriate industry fora. The TFPC is currently addressing an issue regarding fraud prevention for service provider local number portability. The TFPC accepted this issue in May 1997 and is working to identify the potential for fraud in the architecture, billing and interconnection arrangements associated with service provider LNP and to develop solutions to these situations. Although progress has been made with this issue, we hope to even learn more about the potential for fraud by monitoring the Illinois Local Number Portability number portability trial and other LNP implementations.

The second NRIC recommendation was for ATIS to consider expanding the charter of the TFPC to address network security. This recommendation was initially presented for discussion at the July 22-23, 1997 TFPC meeting, where

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Susanne M
Bill K
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participants discussed the appropriateness of the TFPC dealing with network security matters. Further, at our October 28-29, 1997 meeting, Hank Kluepfel of SAIC made a presentation on the similarities of toll fraud control and network security. TFPC participants were requested to discuss within their company's security departments the need for a forum (TFPC or otherwise) to examine network security and share their findings at the next TFPC meeting.

At our January 27-28, 1998 meeting, participants shared their positions relative to this issue and consensus was reached that the TFPC does not have the expertise to address issues of network security and thus should not expand its charter. Many service providers already have internal network security organizations addressing these types of concerns. Further, the TFPC does not possess the skill set to deal directly with issues of network security and therefore would have to rely on other individuals with such knowledge to come and actively participate in the committee. Since the TFPC would need to create this new, different skill set, it was felt that it might be easier to identify other organizations that possessed the necessary skills. One such organization identified by the TFPC was the National Security Telecommunications Advisory Committee (NSTAC). Finally, expanding the TFPC charter to include network security issues would detract from the fundamental purpose for which the TFPC was established: to identify telecommunications fraud and develop solutions to combat it.

Let me express my appreciation for allowing the TFPC the opportunity to address the NRIC recommendations. I will continue to keep you informed of TFPC's progress with regard to LNP.

If you have any questions or would like to discuss further, please feel free to contact me at 303-707-7024.

Sincerely,

A handwritten signature in cursive script that reads "Jim Marshall". The signature is written in dark ink and is positioned above the typed name.

Jim Marshall
TFPC Moderator