

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Developing a Unified Intercarrier)	CC Docket No. 01-92
Compensation Regime)	
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**Comments of the
Alliance for Telecommunications Industry Solutions**

The Alliance for Telecommunications Industry Solutions (ATIS) hereby files these comments in response to *Public Notice* released July 25, 2006, in the above-referenced docket. In the *Public Notice*, comments were sought on the intercarrier compensation reform plan (the Missoula Plan) filed by the National Association of Regulatory Utility Commissioners' Task Force on Intercarrier Compensation. ATIS supports the FCC's efforts to develop equitable intercarrier compensation rules and to address issues that have arisen under the existing intercarrier compensation framework. ATIS is available to assist in the development of the underlying technical standards and guidelines that may be necessary to implement changes to the FCC's intercarrier compensation rules.

ATIS is a technical planning and standards development organization committed to rapidly developing and promoting technical and operational standards for communications and related information technologies worldwide using a pragmatic, flexible, and open approach. Industry professionals from more than 350 communications companies actively participate in ATIS' open industry committees, forums, and "Incubators."¹ ATIS' committees focus on all aspects of communications, from transport and billing to fraud prevention to new technologies such as IPTV. The ATIS membership spans all segments of the communications industry, including local exchange carriers, interexchange carriers, manufacturers, competitive local exchange carriers, data local exchange carriers, wireless providers, broadband providers, providers of operations support, software developers, and internet service providers.

The Missoula Plan addresses a number of issues that are of interest to specific ATIS committees and forums. Members of these committees are the industry subject matter experts on ordering, billing, packet-based services, architectures, signaling, interconnection and interoperability and fraud prevention. These committees can assist in the development of the underlying technical standards and guidelines that would be necessary as a result of changes to the intercarrier compensation framework. In many cases, these committees have developed and maintain guidelines or standards that are specifically referenced in the Missoula Plan and that may be affected, directly or indirectly, by any changes in the compensation framework.

¹ATIS Incubators are industry-driven work groups that provide the industry with a "fast-track" process for resolving technical and operational issues. For more information, see the ATIS incubator web site at: <http://www.atis.org/incubator.shtml>.

For instance, the Missoula Plan specifically references the ATIS Multiple Exchange Carrier Access Billing (MECAB) Document/process and the ATIS Exchange Message Interface (EMI) Document.² These documents were developed, and are maintained, by the ATIS Ordering and Billing Forum (OBF). The OBF identifies, discusses and resolves national issues which affect the ordering, billing, provisioning and exchange of information about access services, other connectivity and related matters. The OBF has twelve Standing Committees that address and resolve issues through the development of national industry standards and guidelines.

One of the OBF Standing Committees, the Message Processing Committee, facilitates the communication, review and resolution of non-access issues and needs for the mechanized exchange of customer-specific usage information related to transaction processing between communications participants. The Message Processing Committee is also responsible for maintaining/updating the EMI Document. Another OBF committee, the Billing Committee, provides a forum for the identification and resolution of issues affecting inter-entity billing related issues (excluding customer specific usage), and for the past year has been working on “phantom” traffic billing issues. The Billing Committee is also responsible for maintaining the: the MECAB Document; the Small Exchange Carrier Access Billing (SECAB) Document; the CABS Auxiliary Report Specifications (CARS) Document; the CABS PICC Dispute File Specifications Document; the Dispute File

² See Missoula Plan for Inter-carrier Compensation Reform at p. 60, 61 (July 18, 2006).

Specifications Document; and the Access/Interconnection Records and related information in the EMI Document.

The Missoula Plan also references the Jurisdiction Information Parameter (JIP).³ JIP is a six digit parameter in the SS7 ISUP Initial Address Message (IAM) used to convey information about call origin, as defined in the industry standard ATIS-PP-1000113.2005, Signalling System No. 7 (SS7) - Integrated Services Digital Network (ISDN) User Part (Revision of T1.113-2000). This standard was developed by the ATIS Packet Technologies and Systems Committee (PTSC), which creates and recommends standards related to services, architectures, and signaling, and other related subjects under consideration in other North American and international standards bodies. Among the work being done by the ATIS PTSC is the development of service and application descriptions and their supporting protocols related to network architectures for, access signaling for, and application of circuit mode, frame mode, packet mode, and cell mode networks via existing and emerging transport (e.g., IP) technology to enable multimedia services.

JIP is also an issue that has been the subject of a great deal of work by the ATIS Network Interconnection Interoperability Forum (NIIF). The NIIF discusses and resolves, on a voluntary basis, industry-wide issues associated with telecommunications network interconnection and interoperability involving network architecture, management, testing and operations. As explained more fully in its February 10, 2006, letter to the

³ See Missoula Plan at p. 56.

Commission, the NIIF has developed *Rules for Populating JIP*.⁴ These rules, the result of a successful cooperative effort by wireline and wireless industry participants, are intended to foster consistency in the telecommunications industry when signalling JIP in the SS7 network.

Unbillable or “phantom” traffic, another important issue addressed by the Missoula Plan,⁵ has been examined in several ATIS committees, including OBF, NIIF and the ATIS Telecommunications Fraud Prevention Committee (TFPC). The TFPC is dedicated to resolving fraud issues impacting the telecommunications industry. The committee identifies issues common to the industry involving telecommunications fraud, and provides an inter-industry mechanism to discuss and develop resolutions for these issues that meet industry needs and requirements. The TFPC focuses on issues such as: VoIP Fraud Implications; Automatic Number Identification (ANI) Masking; Application Screening for Subscription Fraud and/or Identity Theft; Local Number Portability (LNP) Impacts on Churn, Settlements, and Abuses; Joint Billing Management; Payment Fraud Management; Voice Mailbox Hacking; and Call Forwarding Fraud. Due to the sensitive nature of the work performed in the TFPC, companies wishing to participate in the TFPC must first execute a non-disclosure agreement. The agreement permits a full and open discussion among members of issues pertaining to telecommunications fraud, while limiting access to documents by those that might seek to perpetrate fraud.

⁴ ATIS Letter to Marlene H. Dortch, FCC Secretary, in ET Docket No. 01-92 (filed February 10, 2006) explaining appropriate use and limitations of the *Rules for Populating JIP*.

⁵ See Missoula Plan at pp. 56-63.

Conclusion

ATIS supports the FCC's efforts to develop equitable intercarrier compensation rules and stands ready to assist the industry in the development or modification of underlying technical standards and guidelines that may be necessary.

THEREFORE, THE PREMISES CONSIDERED, ATIS respectfully submits its comments in response to the *Public Notice* in the above-referenced docket.

Respectfully submitted by:

**The Alliance for
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