



July 20, 2004

The Honorable John Sununu
111 Russell Senate Office Building
Washington, DC 20510

The Honorable John Sununu:

On behalf of its membership, the Alliance for Telecommunications Industry Solutions (ATIS) applauds your efforts to provide further guidance in the development of standards and protocols relating to Voice over IP (VoIP) communications systems through the introduction of the VOIP Regulatory Freedom Act of 2004 (S. 2281). As a standards development organization that has been at the forefront of VoIP development, ATIS is pleased to provide you with information on its work to develop standards relating to VoIP communications.

ATIS is a technical planning and standards development organization accredited by the American National Standards Institute (ANSI) and committed to rapidly developing and promoting technical and operational standards for communications and information technologies worldwide using a pragmatic, flexible and open approach. Over 1,500 industry professionals from more than 350 communications companies participate in ATIS' industry committees and forums. The ATIS membership includes local exchange carriers, interexchange carriers, manufacturers, competitive local exchange carriers, data local exchange carriers, wireless providers, cellular providers, broadband providers, software developers and internet service providers. More information about ATIS can be obtained from the ATIS web site at www.atis.org.

In June of 2004, ATIS announced an industry technical work plan designed to identify needed standardization efforts pertaining to VoIP. This work plan recognizes the need to ensure interoperability among different technologies and to satisfy the performance expectations of the communications industry. Included in this new work plan is an outline of standardization efforts regarding a variety of VoIP issues, including interoperability, wireless VoIP, interprovider interfaces, public safety and network security issues. This work plan will ensure an effective and efficient resolution of key VoIP issues in a coordinated fashion.

The technical work plan is not the only VoIP project underway at ATIS. ATIS Technical Committees T1P1 (Wireless/Mobile Network Standards) and T1S1 (Network Architectures & Signaling Standards) are working with law enforcement, including the Federal Bureau of Investigation (FBI), to develop appropriate standards for the lawful surveillance of VoIP and other packet-mode communications. In fact, ATIS recently proposed to develop a standard for lawful intercept outside the confines of those mandated by the Communications Assistance for Law Enforcement Act. This standard would assist law enforcement in authorized interceptions of communications on VoIP systems. ATIS will continue its close cooperation with law enforcement on these future standards through the FBI's participation in ATIS technical committees.



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In addition, ATIS' Emergency Services Interconnection Forum (ESIF) is looking at both short-term and long-term solutions for VoIP 911 capabilities. ESIF is working with VoIP providers, public safety answering points and traditional telecommunications providers to develop a 911 protocol that is adaptable to new technologies, including VoIP communications. This protocol will remove the technical restrictions imposed by the current 911 interface and provide a richer interaction among dispatch agencies, first responders, emergency service providers and government agencies.

If it would be helpful to you or your staff, ATIS would be happy to provide more information about its work on these issues or on any other issues pertaining to the development of standards for VoIP communications. A copy of the 2003 ATIS Annual Report accompanies this letter and provides general information on ATIS.

If you have any questions regarding this matter, please do not hesitate to contact me at 202-434-8847 or mcampbell@atis.org.

Respectfully submitted,

Megan Campbell
General Counsel

cc: Michael O'Reilly, Legislative Assistant