

October /5, 1987

Mr. Gerald Brock  
Chief, Common Carrier Bureau  
Federal Communications Commission  
1919 M Street, N.W., Room 500  
Washington, D.C. 20554

Re: New ECSA ONA-Related Committee

Dear Mr. Brock:

As designated representatives of the seven Regional Bell Operating Companies (RBOCs), we are pleased to inform you that, at the express request of the RBOCs, the Exchange Carrier Standards Association (ECSA) has created a new standing committee that will conduct activities related to the Commission's Open Network Architecture (ONA) requirements that were developed in its Computer III proceeding (CC Docket No. 85-229). The new ECSA committee will be known as the Information Industry Liaison Committee (IILC).

The RBOCs recognize that the Commission's ONA concept requires them to offer under tariffs those specific basic network functions needed for the provision of enhanced service offerings on an unbundled and non-discriminatory basis. The Commission expressly stated that, in implementing ONA, "standards organizations, such as the T1 Committee, should play a major role in resolving relevant standards issues that may arise among carriers and enhanced service providers...." Report and Order released June 16, 1986, para. 219. In concert with the Commission's comments, the RBOCs requested that the ECSA form the IILC. The attached October 14, 1987 letter from the ECSA confirms their agreement to do so.


The ECSA currently sponsors and supports the T1 Committee, accredited by the American National Standards Institute (ANSI), as a mechanism for developing voluntary interconnection standards. The ECSA also sponsors the Carrier Liaison (CL) Committee, endorsed by the Commission in 1985, to provide interindustry mechanisms for voluntary resolution of nationwide concerns about the post-divestiture provision of exchange access services to interexchange carriers (ICs). Due to the success of these ECSA organizations established for similar purposes, the RBOCs believe that the IILC will be an appropriate vehicle for dialogue between the RBOCs and the ESPs as ONA is implemented.


IILC meetings will be open to all interested parties, including exchange carriers, ESPs and government agencies, although IILC membership will be limited to ECSA members. Neither the IILC nor any associated forums will address cost, price, or terms and conditions pertaining to ONA-related services, nor will they address any other antitrust-sensitive matters. The IILC will not in any way attempt to restrict ONA services which any RBOC may choose to offer. The IILC will attempt to resolve ONA issues based upon a consensus of all participants. In the event significant opposition hinders the resolution process, every effort will be made to continue working jointly with all interested parties towards a reasonable solution. This should preclude the need for the Commission's complaint process, which remains available to any party. Meeting minutes will be made publicly available. Compliance with adopted resolutions will be voluntary, an arrangement that has not impeded the success of similar ECSA Committees in the past.

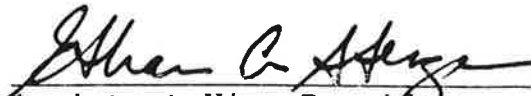
The RBOCs have a common understanding that creation of the IILC in no way relieves them of the obligations placed upon them by the Commission's Computer III orders. The RBOCs will continue to deal directly with various representatives of the enhanced services industry. However, the ONA development process has now reached the point that it is not practical for groups of RBOCs or individual RBOCs themselves to attempt to interact with the entire ESP industry on every ONA issue. For this reason, because of the past success of similar ECSA Committees, and because of the Commission's encouragement of continued industry interaction, the RBOCs believe that the IILC will provide an effective structure for problem resolution and progress in the evolution of ONA.


Should you have any questions, please do not hesitate to call anyone listed on the attachment.


Sincerely,

  
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Assistant Vice President-  
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Assistant Vice President-  
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Managing Director-Marketing  
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Attachments

cc: The Honorable Dennis Patrick, Chairman  
The Honorable James H. Quello  
The Honorable Mimi Weyforth Dawson  
The Honorable Patricia Diaz Dennis  
Mr. William Maher - Special Counsel - The Federal  
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October 14, 1987

Mr. Peter M. Ciccone  
Chairman, ONA Ad Hoc Committee  
120 Bloomingdale Road  
White Plains, New York 10605

Dear Peter:

This is to inform you that on October 14, 1987, the Exchange Carrier Standards Association, Inc. (ECSA) Board of Directors approved ECSA's sponsorship of the Information Industry Liaison Committee (IILC). As its sponsor, ECSA believes that IILC will provide an effective forum in which to foster participation by the exchange carrier industry and the information and enhanced service provider industry for the development of basic Open Network Architecture (ONA) components and the resolution of other ONA related issues.

ECSA recognizes that, at present, the ONA requirements imposed by the Computer III Report and Order belong to AT&T and the Bell Operating Companies (BOCs) and that any ONA obligations of other exchange carriers have not yet been determined. In this regard, ECSA understands that the primary responsibility for ONA operational and administrative issues properly lies with individual exchange carriers. However, ECSA also recognizes that, within its framework, the resolution of nationwide concerns about the definition and provision of ONA basic service arrangements will be aided by an independent committee such as IILC. As with the other ECSA-sponsored Committees and their Associated Forums, IILC is being established to address industry-wide concerns in a prompt and efficient manner and to provide for representation of interested industry groups.

ECSA believes that its sponsorship of IILC is consistent with the FCC's view that industry standards organizations should "[p]lay a major role in resolving relevant standards issues that may arise among carriers and

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enhanced service providers participating in enhanced service markets." (Report and Order, ¶ 219) The formation of IILC gives exchange carriers and information and enhanced service providers the opportunity to address ONA issues to develop design offerings that will utilize network services in the most flexible and economical manner practicable. In this respect, ECSA's sponsorship of IILC is consistent with its fundamental goal to provide ready and adaptable forums for addressing interindustry technical issues affecting the nation's essential telecommunications facilities and services. Most importantly, IILC will afford the industry-wide participation that the Commission so strongly urges in its Computer III Order.

Respectfully submitted,



Bruce R. DeMaeyer

Chairman  
ECSA Board of Directors