

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Service Rules for the 698-746, 747-762 and 777-792 MHz Bands)	WT Docket No. 06-150
)	
Implementing a Nationwide, Broadband, Interoperable Public Safety Network in the 700 MHz Band)	PS Docket No. 06-229
)	
Amendment of Part 90 of the Commission's Rules)	WP Docket No. 07-100
)	

**COMMENTS OF THE
ALLIANCE FOR TELECOMMUNICATIONS INDUSTRY SOLUTIONS**

The Alliance for Telecommunications Industry Solutions (ATIS) hereby submits these comments in response to the *Fourth Further Notice of Proposed Rulemaking (Fourth FNPRM)* pertaining to the deployment and operation of a nationwide, interoperable public safety network. As the North American Organizational Partner of the Third Generation Partnership Project (3GPP), ATIS is pleased that the Commission has decided to use the Long Term Evolution (LTE) technology platform developed by 3GPP for this network. ATIS' comments focus on one issue related to the eligibility for International Mobile Subscriber Identity (IMSI) codes, the Public Land Mobile Network Identifiers (PLMN IDs), to be used in the nationwide public safety network. As explained more fully below, ATIS seeks to clarify a statement made in the *Fourth FNPRM* and to update the Commission on the eligibility requirements for IMSIs as specified in the ATIS IMSI Oversight Council's (IOC) IMSI Assignment and Management Guidelines and Procedures (IOC Guidelines).

I. Background

ATIS is a global standards development and technical planning organization that leads, develops, and promotes worldwide technical and operations standards for information, entertainment, and communications technologies. ATIS' diverse membership includes key stakeholders from the information and communications technologies industry, including wireless and wireline service providers, equipment manufacturers, providers of commercial mobile radio services, broadband providers, consumer electronics companies, public safety agencies, and internet service providers. More than 200 companies actively participate in ATIS' committees and forums, which develop standards, specifications, best practices, and guidelines essential to communications networks' operation and continued evolution.

ATIS is a founding and sole North American Organizational Partner in 3GPP. Established in December 1998, 3GPP is a collaborative effort between key telecommunications associations to make globally applicable technical specifications for a 3rd Generation and Beyond Mobile System based on the evolved GSM core network, and the Universal Terrestrial Radio Access (UTRA). As one of the six Organizational Partners, ATIS jointly owns all 3GPP specifications and publishes relevant 3GPP specifications as ATIS standards for use in North America. In addition to ATIS, the other current partners are the Association of Radio Industries and Businesses, China Communications Standards Association, European Telecommunications Standards Institute, Telecommunications Technology Association, and Telecommunication Technology Committee.

II. Discussion

In the *Fourth FNPRM*, the Commission seeks input regarding the use of IMSIs for the nationwide public safety network, and correctly notes that the assignment of IMSIs is accomplished through a process managed by the ATIS IOC.¹ Unfortunately, the Commission inaccurately describes the eligibility requirement for IMSI assignment by stating that the IOC requires commercial mobile operators to become members of the GSM Association.² This statement is not accurate and does not reflect either the current or past versions of the IOC Guidelines.

Some background pertaining to the IOC and the IOC Guidelines may be helpful. The IOC is an industry committee of organizations with a direct interest in the management of IMSI codes, which are used to identify mobile terminals for the purpose of international roaming. The IOC, which is open to all directly- and materially-interested participants including governmental agencies such as the Commission, develops consensus requirements and procedures for the assignment and maintenance of IMSIs, and specifically a portion of the IMSI known as the Home Network Identity (HNI).

The IOC is responsible for overseeing the management of IMSI codes that have been assigned to the United States and its possessions as authorized by the U.S. Department of State since 1996. IMSI HNIs are issued in accordance with the IOC Guidelines,³ which are based on the International Telecommunications Union recommendation⁴ that underlies the global assignment of IMSIs, and are maintained and updated by the IOC with the consensus of IOC

¹ *Fourth NPRM* at ¶34.

² *Id.*

³ International Mobile Subscriber Identity (IMSI) Assignment and Management Guidelines and Procedures, Version 12 (December 2010). This document is publically available at no charge from the ATIS IOC website at: <http://www.atis.org/IOC/index.asp>.

⁴ ITU-T Recommendation E.212, The International Identification Plan For Mobile Terminals and Mobile Users (11/98).

participants. The IOC Guidelines therefore are a living document that changes to meet evolving industry and user needs.

When the Commission was drafting the *Fourth FNPRM*, Version 11 of the IOC Guidelines was in effect. As with previous versions, this version required an HNI applicant to be a “public mobile operator.”⁵ This version also included an alternative eligibility criterion for entities that did not operate a public mobile network, but that needed IMSI HNIs (such as Mobile Virtual Network Operators). Under this alternative, entities that were not public mobile operators were eligible to obtain codes if they were “...at least an associate member with the GSM Association or other recognized/approved industry governing body.”⁶ Membership in the GSM Association or other recognized association, however, was never required and was offered only as an alternative eligibility option to provide a greater access to HNI codes.

The current version of the IOC Guidelines, Version 12, eliminates any possibility of confusion pertaining to this issue. At the request of the public safety community, the ATIS IOC worked diligently and cooperatively with the staff of National Institute of Standards and Technology and the Commission, and the IOC Guidelines were amended in December 2010 to accommodate IMSI HNI use as PLMN IDs by public safety. In addition, the IOC made available the test IMSI mobile network codes for use by the public safety participants at the beginning of the process while the IOC Guideline revisions were in process.

As a result of this effort, the application criteria were revised significantly. Among the revisions was the removal of the reference to the GSM Association or other recognized/approved industry governing body. Thus, the eligibility requirements in the IOC Guidelines now read:

⁵ IOC Guidelines, Version 11, Section 6.1

⁶ *Id.* at Section 6.4.

The HNI applicant must be, and certify that it is, a public network operator (commercial or government), or an authorized agent operating on behalf of a public network operator, offering mobility services in the United States with a need to roam onto/from commercial networks, or that it is a provider of a service profile management system (e.g. Home Location Register [HLR], Home Authentication, Authorization, and Accounting [AAA], or Home Subscriber System [HSS]) based in the United States for end user devices that can access public networks in the United States.⁷

The ATIS IOC believes that the current version of the IOC Guidelines addresses the needs of the nationwide public safety network operators. To the extent that there are further concerns or questions pertaining to the IOC Guidelines, ATIS would welcome input and participation by those that may have a direct interest in the management of IMSI codes in future IOC meetings.

Finally, ATIS notes that the Commission mentions the limited availability of IMSI HNIs in the *Fourth FNPRM*.⁸ For the Commission's consideration, attached to these comments is the most recent IMSI HNI Exhaustion Analysis, dated March 21, 2011.

⁷ IOC Guidelines, Section 6.1.

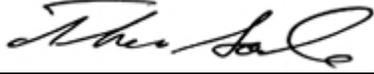
⁸ *Fourth FNPRM* at ¶32.

III. Conclusion

ATIS appreciates the opportunity to provide these comments in response to the *Fourth FNPRM*. ATIS hopes that the information provided in these comments clarifies the eligibility requirement for PLMN IDs and provides useful information pertaining to the current requirements as specified in the IOC Guidelines.

Respectfully submitted,

ATIS

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Dated: April 11, 2011

**IMSI Exhaustion Analysis
As of March 21, 2011**

MCC Code	2-Position MNCs Assigned	2-Position MNCs Available for Assignment Immediately
310	100	0
311	76	24
312	0	100
313	0	100
314	0	100
315	0	100
316	1	99
TOTAL	177	523

NOTE: IMSI assignments for the first three months of 2011 have averaged 3 per month based upon modifications to the Guidelines in Version 12, an increase from 1.5 per month in previous years. If this increase in assignment rate is not an initial spike, full exhaustion could occur in approximately 14.5 years (September 2025).