

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

In the Matter of)	
)	
Connect America Fund)	WC Docket No. 10-90
)	
A National Broadband Plan for Our Future)	GN Docket No. 09-51
)	
Establishing Just and Reasonable Rates for Local Exchange Carriers)	WC Docket No. 07-135
)	
High-Cost Universal Service Support)	WC Docket No. 05-337
)	
Developing an Unified Intercarrier Compensation Regime)	CC Docket No. 01-92
)	
Federal-State Joint Board on Universal Service)	CC Docket No. 96-45
)	
Lifeline and Link-Up)	WC Docket No. 03-109

COMMENTS

The Alliance for Telecommunications Industry Solutions (ATIS), on behalf of its Next Generation Interconnection Interoperability Forum (NGIIF) and Ordering and Billing Forum (OBF), hereby submits these comments in response to the Federal Communications Commission's (Commission) *Notice of Proposed Rulemaking (NPRM)* in the above-referenced dockets. ATIS supports the Commission's efforts to modernize its rules, including its universal service fund and intercarrier compensation regimes, to reflect developments in telecommunications networks and technologies and to tackle the problems associated with unbillable communications traffic (i.e., phantom traffic).

As explained more fully below, ATIS: (1) notes that, while it supports the Commission's proposal to require the calling party number (CPN) to be provided by the originating service provider, limitations pertaining to CPN should be considered; (2) recommends that sufficient time be afforded to permit the industry to modify existing guidelines that will likely be affected

by the Commission's proposed rules pertaining to unbillable traffic, or by other changes to the universal service fund (USF) or intercarrier compensation rules (ICC); and (3) appreciates the Commission's recognition of the industry's work in this area and its willingness to let the industry continue to develop effective guidelines pertaining to billing and interconnection issues.

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's 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. Both the ATIS NGIIF and OBF are comprised of industry subject matter experts on issues related to the operation, billing and interconnection of legacy and next generation networks, including unbillable traffic. These groups create, maintain, and update key industry guidelines pertaining to billing and operational issues, which are developed using ATIS' open, equitable and consensus-based processes.

The ATIS NGIIF provides an open forum to encourage the discussion and resolution of industry-wide issues associated with telecommunications network interconnection and interoperability and the exchange of information concerning relevant topics, such as network architecture, management, testing and operations, and facilities. This input addresses, and is used

to develop, operational procedures associated with these emerging technologies as well as next-generation network interconnection and interoperability issues that involve architecture, disaster preparedness, installation, maintenance, management, reliability, routing, security, and testing between network operators.

The ATIS OBF is an open telecommunications industry forum that identifies and resolves national issues affecting the ordering, billing, provisioning and exchange of information about access services, connectivity and related matters. The OBF encourages participation from all segments of the communications industry and includes as members a variety of wireless and wireline service providers, including Competitive Local Exchange Carriers, Incumbent Local Exchange Carriers and cable companies.

II. There are Technical Limitations to CPN

In the *NPRM*, the Commission seeks comment on a comprehensive set of changes to the existing USF and ICC regimes. Among the rules proposed are those directed at addressing the problem of unbillable traffic by, among other things, requiring originating service providers to provide CPN and by prohibiting the stripping or altering of call signaling information.¹ ATIS commends the Commission on its efforts to address unbillable traffic and notes that much of the work being done within ATIS committees is directed at ensuring that communications providers can effectively interoperate and accurately transmit data. While ATIS believes that the Commission's proposed rule pertaining to the transmission of CPN may be beneficial, it notes that there are limitations to CPN that may affect the effectiveness of this proposed rule.²

¹ *NPRM* at ¶626.

² ATIS has noted these limitations in its response to the Federal Trade Commission's *Advanced Notice of Proposed Rulemaking* pertaining to revisions to its Telemarketing Sales Rule. See January 28, 2011, Correspondence from ATIS to FTC in response to Advanced Notice of Proposed Rulemaking Concerning Caller Identification, Matter P104405 (rel. Dec. 15, 2010).

One limitation relates to the uniformity of CPN. ATIS notes that different entities may populate CPN with different information. Examples of such information could include: “call back number,” “calling party identity,” and “billed number.” Therefore, because CPN is not always populated with the same information, the use of CPN is not uniformly reliable.

A related limitation is the verification of CPN. ATIS notes that, while many service providers offer terminating services that provide calling number and/or calling name services, these terminating services are limited in that they can only relay to the consumer information the service providers themselves receive from the originating caller. The terminating providers cannot independently verify such information – these providers must assume that the CPN is delivered reliably (i.e., transmitted without introduced errors).

III. Industry Must Be Afforded Sufficient Time to Update/Revise Guidelines

As the Commission acknowledges in the *NPRM*, much of the technical work pertaining to billing and interconnection has been done by the industry. For example, the Commission notes that the “[t]echnical content and format of SS7 signaling is governed by industry standards rather than by Commission rules...”³ ATIS therefore urges the Commission to take into account in any new rules the time necessary for the industry to appropriately update and revise its guidelines in order to ensure a seamless transition to any new USF and/or ICC regime.

Among the key industry guidelines related to the billing of communications traffic is the Exchange Message Interface (EMI) that has been created and is maintained by the ATIS OBF.⁴ The Commission correctly acknowledges that this document is typically used by service providers delivering billing records.⁵ The EMI provides a unique but common method for

³ *NPRM* at ¶621.

⁴ Exchange Message Interface (EMI) Industry Support Interface, Issue 23 (ATIS-0406000-23).

⁵ ATIS notes that the *NPRM* (¶622, note 951) references Version 22 of the EMI document, which was published in July of 2005. The current version of this document, Version 23, was published in 2009.

exchange of telecommunications message data between sending and billing companies for billing and tracking analysis. This message data is provided between companies via multiple unique record layouts that contain message data, customer billing information, account summary information and tracking analysis.

The EMI document, however, is not the only industry-developed and -maintained document that relates to billing and interconnection and that may be affected by rules adopted in response to the *NPRM*. Other documents that may be impacted include:

- Multiple Exchange Carrier Access Billing (MECAB) Guidelines, Issue 10 (ATIS-0401004-00010). These guidelines address meet-point billing (MPB) options and identify common data elements for the provision of accurate, verifiable and auditable bills in multiple provider situations. The guidelines provide procedures for making common data elements and other data available to all providers and address: common service identifiers; the calculation of transport mileage; the identification of the involved providers; provider-to-provider transfer of adjustment information and usage data; and MPB conversion and notification procedures. The document also contains the recommended guidelines for the billing of access and interconnection services provided to a customer by two or more providers or by one provider in two or more states within a single local access transport area (LATA).
- Small Exchange Carrier Access Billing (SECAB) Guidelines, Issue 13 (ATIS-0401005-00013). SECAB provides guidelines for producing complete and verifiable access bills for customers. SECAB identifies the information that small providers should provide in order to meet customer criteria for complete and verifiable access bills. These guidelines also include customer preference and conditional data elements and address access and interconnection billing requirements.
- Multiple Exchange Carrier Ordering and Design (MECOD), Version 7 (ATIS-0404120-00007). The MECOD establishes methods for processing orders for access service that is to be provided to an interexchange carrier by two or more exchange carriers and provides a framework for ordering and design requirements. The MECOD covers the ordering and design process from submission of an Access Service Request (ASR) through the issuance of work documents.
- Network Interconnection Interoperability Reference Document, Part X- Interconnection Between LECs- Operations Handbook Local Interconnection Service Arrangement, Version 11.1 (ATIS-0300032). This document provides guidelines to personnel of interconnecting LECs for the installation, testing and maintenance of local interconnection service arrangement trunks and services. Among the recommended practices is that the CPN field be populated by the originating network with a valid 10-digit North American Numbering Plan (NANP) subscriber line or directory number.

There is also a current work project in NGIIF to address a CPN-related issue. This work project would further clarify how to populate the CPN field, with a goal toward updating the Network Interoperability Reference Document noted above (ATIS-0300032). While the NGIIF continues to believe that a 10-digit NANP number that is representative of the true calling party end user should be included in the CPN field of the original Initial Address Message (except in lawfully-approved situations consistent with public safety needs), the NGIIF is examining whether further clarification of this matter should be provided to avoid potential industry confusion.

ATIS notes that the industry will need to examine its existing industry guidelines and its pending work programs to determine whether any changes are warranted. ATIS urges the Commission to accommodate this need in determining implementation deadlines for any new rules that may be adopted.

IV. Industry Work Should Not Be Unnecessarily Overwritten

In the *NPRM*, the Commission notes that its proposal to address unbillable traffic “balances a desire to facilitate resolution of billing disputes with a reluctance to regulate in areas where industry resolution has, in many cases, proven effective.”⁶ ATIS appreciates the Commission’s recognition of the industry’s work in this area and its willingness to let the industry continue to develop effective guidelines pertaining to billing and interconnection issues. ATIS is particularly supportive of the Commission’s approach in the two areas noted below.

The Commission mentions that, to comply with its proposed requirement that CPN be provided by the originating service provider, providers transmitting traffic using internet protocols “would likely be required to transmit the required information in the Internet protocol

⁶ *NPRM* at ¶620.

signaling messages that set up and terminate calls.”⁷ However, instead of disrupting existing industry work, the Commission proposes to take a cautious approach in considering new or revised signaling requirements.⁸ ATIS supports such an approach and urges the Commission to allow the industry to continue its work on signaling issues.

ATIS also strongly supports the Commission’s approach to the population of SS7 fields, namely that the Commission does not propose making any changes in the designation of particular SS7 fields as mandatory or optional, or propose changes to industry standards that govern the population of the SS7 signaling stream.⁹ As the developer of many of the industry standards and guidelines pertaining to SS7, ATIS supports this. This approach will allow the industry to retain the ability to make necessary changes to the underlying standards and guidelines to meet evolving needs.

⁷ *NPRM* at ¶627.

⁸ *Id.*

⁹ *NPRM* at ¶628.

V. Conclusion

ATIS supports the Commission's proposal to require the originating service provider to transmit the CPN but notes that there are limitations pertaining to CPN that should be considered. ATIS also recommends that sufficient time be provided to permit the industry to modify existing guidelines that may be affected by the Commission's proposed rules. Finally, ATIS appreciates the Commission's acknowledgement of industry work pertaining to billing and interconnection issues and urges the Commission to let the industry continue to develop effective guidelines and standards.

Respectfully submitted,

ATIS



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Dated: April 1, 2011