



1200 G Street, NW
Suite 500
Washington, DC 20005

P: 202-628-6380
F: 202-393-5453
W: www.atis.org

October 23, 2008

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VIA ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, S.W.
Washington, D.C. 20554

Re: *Ex Parte*
CC Docket No. 01-92

Dear Ms. Dortch:

The Alliance for Telecommunications Industry Solutions (ATIS), on behalf of its Network Interconnection Interoperability Forum (NIIF), submits this letter in response to a recommendation made by Neutral Tandem in the above-referenced docket regarding the routing of telecommunications traffic.¹ Neutral Tandem urges the Commission not to adopt a blanket rule requiring all telecommunications traffic to be routed in accordance with the LERG™ Routing Guide.² While ATIS expresses no view regarding such a blanket rule, it strongly believes that the LERG™ Routing Guide is part of the solution to phantom traffic and disagrees that the use of the LERG™ Routing Guide restricts competition.

ATIS, the global standards development and technical planning organization for the information, entertainment and communications technologies, has been actively involved in the resolution of questions regarding the use of the LERG™ Routing Guide and the development of industry guidelines involving the LERG™ Routing Guide. ATIS' work on traffic routing is primarily accomplished in its NIIF, which discusses and resolves, on a voluntary basis, industry-wide issues associated with telecommunications network interconnection and interoperability involving network architecture, management, testing and operations. NIIF's Network Routing Resources Information Committee (NRRIC) addresses and resolves issues encompassing local exchange routing processes and associated databases and develops industry procedures to facilitate the exchange of information to provide the highest standards of network routing information and integrity.

¹ See Letter and Presentation from Mark D. Schneider to Marlene Dortch, CC Docket No. 01-92, WC Docket No. 05-337, CC Docket No. 96-45, WC Docket No. 99-68, WC Docket No. 07-135, WC Docket No. 04-36 (August 20, 2008) ("*Neutral Tandem Ex Parte*").

² *Id* at 12.

The LERG™ Routing Guide serves as a roadmap when going from one network to another. It reflects the current network configuration and scheduled network changes for all entities' originating or terminating Public Switched Telephone Network (PSTN) calls within the North American Numbering Plan (NANP). The LERG™ Routing Guide provides a common means for service providers within the NANP to publish their assigned numbering resources and associated routing data.

While the LERG™ Routing Guide is not the only source for routing data, it has served as the primary source for such data for over 24 years. As a result of the LERG™ Routing Guide's ubiquitous application by industry participants, uniformity in network routing exists. The LERG™ Routing Guide accommodates both originating and terminating transit providers of all types. In response to the assertion in Neutral Tandem's FCC filing, traffic routed in accordance with the LERG™ Routing Guide does *not* restrict competition. Further, competitive carriers are *not* forced to name only the ILEC tandem as their homing tandem in the LERG™ Routing Guide. In fact, the LERG™ Routing Guide does not restrict carriers to name the ILEC tandem as their homing tandem. The recommendations by Neutral Tandem related to the primary routing data source could result in extensive industry process changes and increased costs. However, ATIS believes that the continued use of the LERG™ Routing Guide, and the industry processes supporting it, would minimize financial impacts to service providers.

Both the LERG™ Routing Guide and the Business Integrated Routing and Rating Database System (BIRRDS), the underlying traffic routing database, are integral components of ATIS guidelines that are used throughout the NANP, including the *Central Office Code (NXX) Assignment Guidelines (COGAG)* (ATIS-0300051) and *Thousand-Block Number (NXX-X) Pooling Administration Guidelines (TBPAG)* (ATIS-0300066). These guidelines have been recognized by the FCC and are widely used by the telecommunications industry.

Finally, ATIS encourages any company who believes the LERG™ Routing Guide does not address a specific routing concern to raise it with the NIIF-NRRIC for discussion and resolution.

ATIS would welcome the opportunity to meet with you to further discuss the work of NIIF and the NRRIC. Additionally, please do not hesitate to contact the undersigned if there are any questions regarding this matter.

Sincerely,



Thomas Goode
General Counsel