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October 2, 2000

Problem Solvers to the
Telecommunications Industry

VIA HAND DELIVERY

Magalie Roman Salas
Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW, Room TW-204B
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: *Ex Parte* Presentation in CC Docket No. 99-216

Dear Ms. Salas:

On September 28, 2000, the Alliance for Telecommunications Industry Solutions (ATIS), at the request of the Federal Communications Commission, met with Commission staff to discuss the ATIS Comments and Reply Comments in CC Docket No. 99-216 regarding the Part 68 Gatekeeper. The individuals representing ATIS were Martin McCue, ATIS Chairman, Susan Miller, ATIS President and CEO, William Klein, ATIS VP of Finance and Operations, Ed Hall, ATIS VP for Technology Development and Megan Campbell, ATIS General Counsel. The Commission staff in attendance included Staci Pies, Deputy Chief, NSD, CCB, Bill Howden, Senior Engineer, NSD, CCB, Susan Magnotti, Attorney, NSD, Dennis Johnson, Attorney, NSD and Geraldine Matise, Deputy Chief, Policy Division, OET.

The discussion was consistent with the presentation materials distributed as well as ATIS' previous filings in this proceeding. The presentation materials are included as an attachment to this letter.

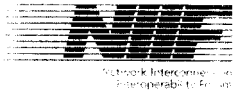
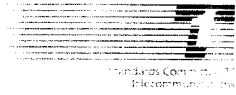
Pursuant to Section 1.1206(a)(1) of the Commissions Rules, ATIS submits an original and one copy of this notice of *ex parte* contact for inclusion in the public record of the above-referenced proceeding. Please date-stamp and return the extra copy to our messenger. Should you have any questions regarding this matter, please contact me at 202/434-8847.

Sincerely,

Megan L. Campbell
General Counsel

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Enclosures



Chairman
Martin McCue
Global Crossing

First Vice Chairman
Fred Fromm
Siemens Information
and Communication
Networks

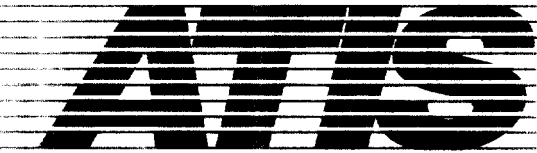
Second Vice Chairman
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President & Chief
Executive Officer
Susan M. Miller
ATIS

Vice President of Finance
& Operations
William J. Klein
ATIS

General Counsel
Megan L. Campbell
ATIS



cc: Staci Pies, Deputy Chief, NSD, CCB
Bill Howden, Senior Engineer, NSD, CCB
Susan Magnotti, Attorney, NSD
Dennis Johnson, Attorney, NSD
Geraldine Matisse, Deputy Chief, Policy Division, OET

ATIS Proposal to the Federal Communications Commission Regarding the CPE Technical Criteria Gatekeeper Organization (CC Docket No. 99-216)

Presented By:

Martin McCue, ATIS Chairman

Susan Miller, ATIS President and CEO

William Klein, ATIS VP, Finance and Operations

Ed Hall, ATIS VP for Technology Development

Megan Campbell, ATIS General Counsel

September 28, 2000

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OVERVIEW OF PRESENTATION

- I. ATIS Proposal**
- II. Process**
- III. Strengths of the ATIS Proposal**
- IV. Strengths of ATIS**
- V. Conclusion**



I. ATIS PROPOSAL

A. Open Industry Organizational Meeting

- Wide Cross-Industry Representation
- Conducted within 60 days of Order release date
- Facilitated by ATIS staff member
- Establishes Gatekeeper Organization
 - Mission/Scope
 - Responsibilities
 - Structure
 - Operating procedures/guidelines



I. ATIS PROPOSAL (cont'd)

B. Gatekeeper Organization (ATIS Sponsored)

- Oversees administration of program
- Cross-industry representation
 - Fewer than 20
 - Rotated according to guidelines
- Responds to queries
- Resolves issues
- Maintains database
- Maintains records and files
- Addresses appeals
- Determines funding
- Provides periodic reports to Commission



II. PROCESS

- Organizational Meeting
 - Planning Group
 - diverse representation (e.g., manufacturers, service providers, testing organizations, SDOs)
 - builds agenda
 - provides straw framework
 - Meeting open to all interested parties.
 - Preferred location is Washington, DC.
 - ATIS staff to facilitate meeting and provide administrative support.



II. PROCESS (cont'd)

- Meeting deliverables: membership definition, mission, scope, responsibilities, operational procedures and potential funding models for the Gatekeeper Organization.

- Proposed Gatekeeper framework will meet the following minimum criteria:
 - membership must be balanced, diverse and representative of all industry segments with a plan for membership rotation;
 - open meetings;
 - adequate notification and distribution of agenda prior to meeting date;
 - public dissemination of all meeting materials in a timely manner;
 - adequate and accurate record-keeping;
 - issue resolution through consensus;
 - appropriate industry notification of resolutions with adequate time for review and comments;



II. PROCESS (cont'd)

- Proposed framework will meet the following minimum criteria (cont'd):
 - restrictions or guidelines regarding antitrust sensitive discussions;
 - careful consideration of all views and objections;
 - procedure for unresolved comments/objections to remain on the record; and
 - defined appeals process.

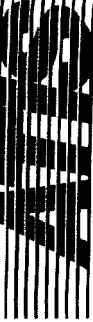
- Gatekeeper Organization to meet following the conclusion of the Organizational Meeting work and the establishment of the organization's membership. Target - no later than 4 months from the release date of Order.

- ATIS to provide secretariat, equipment registration and database management support consistent with the industry developed processes and procedures.



III. STRENGTHS OF PROPOSAL

- Broad industry involvement and representation.
- Broad industry awareness and involvement resulting in consensus Gatekeeper Organization and processes. Buy-in.
- Historically a successful approach, for example:
 - Carrier Liaison Committee (CLC);
 - Network Reliability Steering Committee (NRSC);
 - Internetwork Interoperability Test Coordination (IITC) Committee;
 - International Mobile Station Identities (IMSI) Management Forum (IMF); and
 - CALEA Legal Summit.
- Provides for timely transition of responsibilities from the Commission to the industry.
- Commission has active monitoring role.



IV. STRENGTHS OF ATIS

- Unique neutral nature.
- Technology neutral.
- Diversity of membership and open committee participation.
- History of providing venues for process and problem solving resulting directly from regulatory mandate or at the industry's request as necessitated by regulatory mandate.
- Staff experience and competency in support of activities.
- Reputation as being governed by fair and open processes.
- Existing infrastructure in place.



IV. CONCLUSION

- ATIS exists to provide open and fair forums for the industry to come together and create standards and guidelines in lieu of regulatory intervention.
- ATIS can accomplish the goals of the Commission and industry in providing a fair and open forum and facilitating an expeditious and successful transition of the Part 68 responsibilities.
- ATIS staff has the experience and know-how to provide the support required by the Gatekeeper Organization and a history which demonstrates the ability to effectively and promptly implement the approach proposed.
- ATIS is well-positioned to serve as the sponsor and secretariat to the Gatekeeper Organization.

