

Standards Committee T1

June 24, 2002

Carrier Liaison Committee

Telecommunications  
Industry Forum

VIA ELECTRONIC FILING

Ordering and Billing  
Forum

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12th Street, SW, Room TW-A325  
Washington, DC 20554

Network Interconnection  
Interoperability Forum

Industry Numbering  
Committee

Re: *Ex Parte* Communication in CC Docket No. 99-200

Protection Engineers  
Group

Dear Ms. Dortch:

Standards Committee O5

Network Reliability  
Steering Committee

On June 21, 2002, representatives from the Industry Numbering Committee (“INC”), a committee sponsored by the Alliance for Telecommunications Industry Solutions, met with representatives from the Federal Communications Commission (“FCC” or “Commission”) to discuss the INC correspondence to Dorothy Attwood, Chief, Wireline Competition Bureau, dated May 21, 2002 (“Letter” or “INC Letter”). In attendance, representing the Commission, were Diane Griffin, Assistant Chief, WCB, via conference bridge; Sanford Williams, Designated Federal Officer, NANC; Jennifer Gorny, Assistant Designated Federal Officer, NANC; and Cheryl Callahan, Assistant Division Chief, TAPD, WCB. The individuals representing the INC were Rose Travers, USTA, INC Assistant Moderator; John Colombo, Verizon, LNPA Co-Chair; Julie Petersen, SBC, INC Representative; Alissa Medley, ATIS/INC Committee Administrator; and Megan Campbell, ATIS General Counsel.

Internetwork  
Interoperability Test  
Coordination Committee

Telecommunications  
Fraud Prevention  
Committee

Generic Requirements  
Users Group

The purpose of the meeting was to discuss the INC Letter. The INC Letter discussed the INC issue resolution process and the current Pooling Administrator’s timeline for identifying system impacts or change orders resulting from INC issue resolutions. The INC provided several suggestions as to how the INC and the PA could align their processes to allow for a more efficient use of resources. A thorough explanation of the process observed currently and the INC’s recommendations are found in the attached presentation that was distributed during the meeting.

International Forum on  
ANSI-41 Standards  
Technology

Interactive Voice  
Response Forum

TTY Forum

Administrative Council for  
Terminal Attachments

IMSI Oversight Council

Marlene H. Dortch  
June 24, 2002  
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Pursuant to the Commission's rules, I am filing one electronic copy of this notice of *ex parte* and request that you place it in the record of the proceedings. Please contact me at 202/434-8847 if you have any questions or comments.

Sincerely,

*Megan L. Campbell*  
General Counsel

Attachment

cc: Robert Atkinson, NANC Chair (rca53@columbia.edu)  
Sanford Williams, NANC DFO, Staff Attorney, TAPD, WCB (swilliam@fcc.gov)  
Jennifer Gorny, NANC ADFO, Staff Attorney, TAPD, WCB (jgorny@fcc.gov)  
Cheryl Callahan, Assistant Division Chief, TAPD, WCB (ccallaha@fcc.gov)  
Mark Oakey, Contracting Officer, FCC Contracts and Purchasing Center  
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David Bench, Nortel Networks, INC Moderator (dbench@nortelnetworks.com)  
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Jean-Paul Emard, ATIS Director - Industry Forums (jpemard@atis.org)  
Alissa Medley, ATIS/INC Committee Administrator (amedley@atis.org)

# **INC Meeting with Federal Communications Commission Regarding PA Change Order Process**

**Presented by:**

**Rose Travers, INC Assistant Moderator  
John Colombo, LNPA Co-Chair  
Julie Petersen, INC Member  
Megan Campbell, ATIS General Counsel  
Alissa Medley, INC Committee Administrator**

**June 21, 2002**

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## Goals of Today's Meeting

- Gain mutual understanding of the process now in place
  - INC issue process
  - PA change order process
  - Interaction between the two
- Identify problem areas
- Discuss INC recommendations
- Address a path forward



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## Background

- INC established in 1993 to develop and maintain national guidelines on number administration.
- INC provides a forum for industry and affected parties to discuss and resolve technical issues through due process.
- Regulatory mandates have consistently been incorporated into the INC Guidelines.
- Technical industry improvements to the Guidelines are vetted through the INC consensus process.
- With advent of pooling and the PA contractual relationship, INC guideline improvements have been delayed due to: 1) Change Order process; and 2) unknown cost impacts.

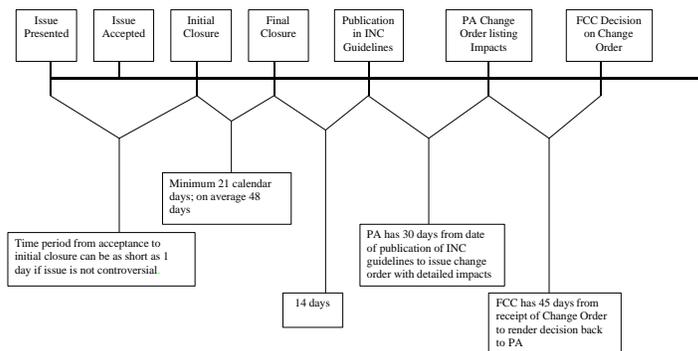


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## Current Working Environment

- Typical lifecycle of an INC issue



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## Problems With Change Order Process

- The recent change order process has had problematic effect on working issues effectively:
  - During issue discussions, INC members struggle with their opinions and options given the absence of any relative cost information and the “uncertainty” of a potential change order.
  - INC does not discuss pricing, market allocation, etc., in accordance with antitrust laws **but** relative costs relating to the resolution of technical issues are necessary; difficult for members to ignore the current “one-for-one” relationship between an issue resolution and its corresponding price tag (Change Order).
- INC is not opposed to the PA requesting additional funds via Change Orders as necessary, but INC would like to have at least some relative cost information available during issue discussion to understand the financial impacts of technically feasible alternatives. Why?



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## An Illustrative Example

- With relative cost information, INC feels that it could make better, more informed decisions during the issue resolution process, especially when several alternatives may be available.
- To illustrate:
  - Issue 365 was introduced in order to overturn a previously accepted resolution related to the closure of Issue 312, which impacted the guidelines.
  - With the industry’s knowledge and experience of Change Orders (#s 4 & 5) that were created subsequent to Issue 312 going to Final Closure, the INC successfully worked, in conjunction with interactive PA guidance, and closed Issue 365 at the satisfaction of the issue contributor, solving the original problem.
- If PA impact analysis was available during discussion of Issue 312, the INC would have come to the better resolution and two change orders would never have had to be written.

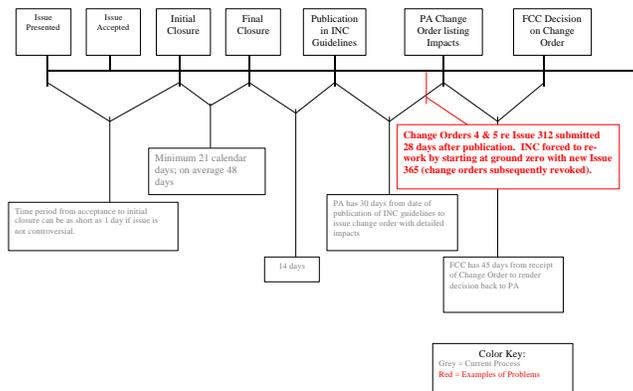


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## Problem Depicted

- Re-work, e.g., Issue 365, should not be part of the normal INC process to resolve issues.



## Planning for the future...

- INC seeks an understanding of the permissive vs. restrictive nature of the PA contract to better facilitate pooling administration improvements for both the PA and industry. This only pertains to issue management at INC, not to other aspects of PA contract.
- Improve efficiency by introducing: a) an up-front “analysis” when PA submits issues, b) a “draft” release of change order, and c) use of scheduled PAS updates.
- Is there a way for INC to be notified when a decision is made on those change orders based on INC issues?
- INC desires a cooperative working relationship with the PA (and NANPA). The respective roles are intertwined, and the advent of PAS (and CAS) definitely has altered the way all parties now manage their work.



