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Alliance for Telecommunications
Industry Solutions

Problem Solvers to the
Telecommunications Industry

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DEC 20 2000

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

December 20, 2000

VIA HAND DELIVERY

Magalie Roman Salas
Office of the Secretary
Federal Communications Commission
445 12th Street, SW, Room TW-A325
Washington, DC 20554

Re: Petition for Emergency Relief Regarding Release
of the 855 Toll Free Code, CC Docket No. 95-155

Dear Ms. Salas:

Enclosed are an original and five copies of the reply comments in response to the Commission's recent public notice in the above-captioned proceeding. Please date-stamp and return the extra copy to our messenger.

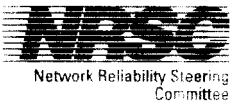
Please contact me at 202/434-8847 if you have any questions or comments.

Sincerely,

Megan L. Campbell
General Counsel

Enclosures

No. of Copies rec'd
List A B C D E



Chairman Martin McCue Global Crossing	First Vice Chairman Ross K. Ireland SBC Communications	Second Vice Chairman Asok Chatterjee Ericsson, Inc.	Treasurer David R. Maccarelli nTelos	President & Chief Executive Officer Susan M. Miller ATIS	Vice President of Finance & Operations William J. Klein ATIS	General Counsel Megan L. Campbell ATIS
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DEC 20 2000

**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY**

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

In the Matter of

Petitions for Emergency Relief Regarding)
Release of the 855 Toll Free Code) NSD File No. L-00-249

Toll Free Access Codes) CC Docket No. 95-155

**REPLY COMMENTS OF THE ALLIANCE FOR TELECOMMUNICATIONS
INDUSTRY SOLUTIONS (ATIS)**

Megan L. Campbell
General Counsel
1200 G Street, NW, Suite 500
Washington, DC 20005
202-434-8847

December 20, 2000

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

In the Matter of

Petitions for Emergency Relief Regarding Release of the 855 Toll Free Code)	NSD File No. L-00-249
Toll Free Access Codes)	CC Docket No. 95-155

**REPLY COMMENTS OF THE ALLIANCE FOR TELECOMMUNICATIONS
INDUSTRY SOLUTIONS (ATIS)**

The Alliance for Telecommunications Industry Solutions (“ATIS”) submits these reply comments in response to the Federal Communications Commission (the “FCC” or the “Commission”) Public Notice (DA 00-2688) issued in the above-captioned proceeding soliciting comments on the issues set forth in the November 9 and November 14, 2000 petitions of the Toll Free Number Coalition (TFNC) and The Toll Free Commerce Coalition (TTFCC), respectively. Specifically, ATIS provides information regarding its sponsored committee -- the SMS Number Administration Committee (“SNAC”) and the SNAC’s processes and role in the 855 release decision. This information is provided to correct the record with respect to several factual inaccuracies and other assertions made during the Comment cycle.

I. The SMS/800 Number Administration Committee (SNAC)

The SMS/800¹ Number Administration Committee (SNAC) is a standing committee of the ATIS-sponsored Ordering and Billing Forum (“OBF” or “Forum”). The SNAC’s mission is to identify, develop and implement the resolution of issues focused on the

¹ As recently as the November 6-10, 2000 OBF General Session Meeting, the SMT requested that ATIS and the OBF reference “SMS/800” as a trademark of the SMT. SNAC Meeting Notes (Nov. 6-10, 2000) at 28. The SNAC agreed to reference future issues as “Toll Free” instead of “SMS/800.” However, the implications to the Committee name and existing documentation have not yet been addressed. Accordingly, ATIS acknowledges the SMT’s request and ATIS’ future need to address the same in this footnote.

support of the 800/Service Management System. As such, some of the issues addressed by the SNAC include those regarding system process enhancements, customer/provider Responsible Organization (RESP ORG) requirements, technical/operational issues and SMS/800 Help Desk RESP ORG support processes. The SNAC also maintains the “Industry Guidelines for Toll Free Number Administration,” a document that outlines, among other things, RESP ORG responsibilities and SMS/800 Help Desk processes.

The SNAC is an open industry committee comprised of small and large RESP ORGs with representation from the SMS Management Team (SMT) and the Database System Management Inc. (DSMI). The SNAC operates under the principle of consensus decision-making and observes the processes and procedures set forth in the OBF Guidelines.²

The OBF Guidelines establish requirements for meeting notices and notes, requirements for Forum funding³, consensus principles and other operational and policy items. The Guidelines also provide information on meeting materials and the method of distribution for the same. For example, the OBF Guidelines explain that e-mail exploder lists have been established for the distribution of information regarding the posting of committee documentation and meeting notification materials.⁴ Instructions on how to subscribe to an e-mail exploder list are provided on the ATIS Web Site⁵ and referenced in the OBF Guidelines. An additional example, one specifically relevant to these Reply Comments, deals with meeting and conference call notification. The Guidelines state that the agenda for General Session Meetings “will be posted to the OBF web site 14 calendar days”⁶

² The OBF Guidelines are available on the ATIS Web Site at <ftp://ftp.atis.org/pub/clc/obf/obf/0300guide.zip>

³ While there is a funding fee to cover the administrative costs associated with the operation of the OBF, a party may subscribe to the SNAC exploder list and have access to all of the Committee’s meeting notes and attachments via the ATIS Web Site without being a funding company of the OBF.

⁴ OBF Guidelines at 29.

⁵ ATIS Web Site at www.atis.org/atis/clc/obf/obfhom.htm

⁶ OBF Guidelines at 29.

prior to the start of the General Session. The agenda for other meetings and conference calls “should be distributed . . . no less than 14 calendar days prior to the date the meeting or conference call is held, unless otherwise agreed to by the committee for that specific meeting or call.”⁷

II. The SNAC Decisions Regarding the Opening of the 866 and 855 Easily Recognizable Codes (ERCs)

As acknowledged by the Commission⁸, the SNAC determines aspects of new toll free code implementation. More specifically, after a given ERC has been released for future implementation by the Industry Numbering Committee (INC), the SNAC recommends a date for the opening of that new ERC to the Commission. The SNAC recommendation is based, in part, on toll free number utilization reports and projections.

In the context of the 866 and 855 ERCs, the following events took place. The SNAC opened issues regarding the coordination of activities for 866 and 855 ERC implementation on November 6, 1997 and December 3, 1997, respectively, with the goal of preventing future exhaust emergencies. In a correspondence dated August 30, 1999 to the Commission, the SNAC recommended that the 866 ERC be opened on April 1, 2000 and the 855 ERC be opened on July 1, 2000⁹. The dates were arrived at in coordination with the United States Telephone Association (USTA) National Services Council due to hardware upgrades necessary to support the ERC openings. On February 4, 2000, the OBF/SNAC sent a correspondence to the Commission recommending a dual code opening on April 1, 2000 and April 8, 2000¹⁰. The date change was prompted by

⁷ OBF Guidelines at 30.

⁸ Fifth Report and Order, *Toll Free Service Access Codes*, 15 FCC Rcd 25 (2000) (“*Fifth Report and Order*”)

⁹ Letter from Gwen Shaw, OBF Moderator, to L. Charles Keller, Chief, Network Services Division (August 30, 1999).

¹⁰ Letter from Ron Havens, OBF Moderator, to L. Charles Keller, Chief, Network Services Division (February 4, 2000).

notification from USTA that all companies could support a dual code opening in the April 1, 2000 timeframe.

As preparations for the April 2000 ERC openings proceeded, industry testing occurred and raised issues regarding the first-come, first-served results of the reservation process. Accordingly, and given the fact that the number utilization reports at the time did not project an immediate exhaust, the SNAC reached consensus on a March 10, 2000 conference call to delay the ERC openings to allow for further analysis. This position was conveyed to the Commission in a correspondence dated March 16, 2000.¹¹

The SMT and DSMI provided further analysis and information regarding the first-come, first-served results of the reservation process to the SNAC over the course of one face-to-face meeting and numerous conference calls. On May 12, 2000, the SNAC, faced with a shrinking exhaust projection and then current exhaust date of December 2000, recommended to the Commission that the 866 ERC be opened on July 29, 2000 and the 855 ERC be opened on November 18, 2000¹². The November date for the 855 ERC opening would be after the system fixes, expected to provide for a first-come, first-served result, were implemented. The 866 ERC opened on July 29, 2000. The SNAC reached agreement during a November 3, 2000 Conference Call that the 855 ERC opening should go forward as planned on November 18, 2000. The agreement reached was based on the system fixes implemented and the subsequent test results as reported by the SMT and DSMI to the SNAC.¹³

¹¹ Letter from Ron Havens, OBF Moderator, to L. Charles Keller, Chief, Network Services Division (March 16, 2000).

¹² Letter from Ron Havens, OBF Moderator, to L. Charles Keller, Chief, Network Services Division (June 5, 2000)

¹³ SNAC Meeting Notes (Nov. 3, 2000) at 2.

III. The SNAC's Appropriate Observance of the OBF Guidelines

During the course of the events described above, the SNAC appropriately observed the OBF processes. The following is provided to correct several factual inaccuracies regarding the SNAC observance of such processes in the Comments of The Toll Free Commerce Coalition (TTFCC) in this proceeding.

First, notice requirements regarding the November 3, 2000 conference call (the 855 Go-No-Go Conference Call) were appropriately given contrary to the assertions made by the TTFCC.¹⁴ The conference call was scheduled in August during the OBF General Session SNAC meeting and the conference call date and purpose were included in the notes of that meeting. An e-mail exploder notice regarding the conference call, its purpose, date, time and the call-in number was sent on September 11, 2000. In addition, a reminder notice was sent via e-mail exploder on November 2, 2000. Both notices are provided as an attachment to these Reply Comments. The conference call had one agenda item, that being the "go-no-go" decision. Accordingly, the OBF Guideline requirements for meeting notification were met.

Second, TTFCC offers as evidence of the SNAC's failure to follow the OBF Guidelines the fact that there is no record of the October 4, 2000 conference call to which RESP ORGs were invited to learn of system test results.¹⁵ In fact, the October 4, 2000 conference call was not a SNAC activity but rather an activity hosted by DSMI. Accordingly, there are appropriately no meeting notes and/or meeting notification information contained on the ATIS/OBF web site.

Finally, TTFCC suggests that the May 2000 presentation given to the SNAC by the ATIS General Counsel regarding Consensus indicates a failure of the SNAC to follow the

¹⁴ See TTFCC Comments at 10.

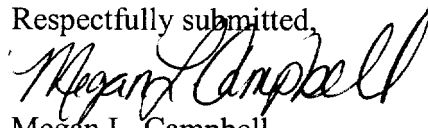
¹⁵ Id.

general consensus principles observed by the OBF.¹⁶ ATIS staff routinely provides presentations to its sponsored committees regarding consensus and other issues of operations. Further, TTFCC states, “that as recently as May 2000 the ATIS General Counsel expressed concerns with the adequacy of SNAC’s meeting notice procedures.” The notes from the May 2000 meeting indicate that a discussion took place regarding the appropriate notice period for conference calls. The discussion was prompted by the fact that during the months preceding and following that meeting, the SNAC was conducted conference calls on a regular basis to accommodate the constant interaction between the SNAC and the SMT/DSMI on the issue of system analysis and fixes for the desired reservation first-come, first-served results. The discussion was an affirmative act by ATIS and the SNAC to provide as much due process and industry notification during a flurry of activity. And, all meeting notices were within the OBF requirements given the provision in the Guidelines allowing for notification of less than 14 days where agreed to by the committee for that specific meeting or call.¹⁷

IV. Conclusion

The SNAC appropriately observed the OBF Guidelines and met its responsibilities to the Industry with respect to the 866 and 855 ERC openings.

Respectfully submitted,



Megan L. Campbell
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¹⁶ Id.

¹⁷ OBF Guidelines at 30.

ATTACHMENT

Reply Comments of ATIS
CC Docket No. 95-155
DA 00-2688
December 20, 2000

-----Original Message-----

From: HEIKE MARTIN [mailto:HMARTIN@atis.org]

Sent: Monday, September 11, 2000 2:40 PM

To: obf-snac@lists.atis.org

Cc: MCAMPBEL@atis.org; mnichol@atis.org; gwenshaw@netzero.net

Subject: Postings

All,

the meeting records for the August 31 full SNAC Conference call & Virtual meeting have been posted to the SNAC meeting records page at <http://www.atis.org/atis/clc/obf/SNAC/Snacmtgs.htm>

The information for the November 3 Full SNAC conference call to discuss Go/No-Go for 855 ERC has been posted to the OBF calendar page at <http://www.atis.org/ATIS/CLC/OBF/obfcal.htm> or you may click on the following link: <http://www.atis.org/ATIS/CLC/OBF/SNAC/sn110300.htm>

If you have any question, please contact me.

Heike

Heike Martin

Committee Administrator, SNAC

ATIS

Phone: (202) 434-8849

E-mail: hmartin@atis.org

-----Original Message-----

From: HEIKE MARTIN [mailto:HMARTIN@atis.org]

Sent: Thursday, November 02, 2000 12:47 PM

To: obf-snac@lists.atis.org

Cc: MCAMPBEL@atis.org; mnichol@atis.org

Subject: Reminder - Conference Call

-----Reminder-----

SNAC participants:

A Full SNAC conference call has been scheduled for Friday, November 3, 1:00 p.m. EST to discuss Go/No-Go for 855 ERC.

The conference call information has been posted to the ATIS calendar page at <http://www.atis.org/ATIS/CLC/OBF/obfcal.htm> or you may go directly to the meeting information page at <http://www.atis.org/ATIS/CLC/OBF/SNAC/sn110300.htm>

Heike

Heike Martin

ATIS

Committee Administrator

ph: 202-434-8849

email: hmartin@atis.org