

ORIGINAL

OBF Reference Number: 01116  
**RECEIVED**



Alliance for Telecommunications Industry Solutions

Sponsor of the



Ordering and Billing Forum

A forum of the Carrier Liaison Committee

1200 G Street NW  
Suite 500  
Washington DC 20005

202-628-6380  
Fax: 202-393-5453  
E-mail: asander@atis.org

Ronald D. Havens  
Moderator

Stephanie Cowart  
Assistant Moderator

Susan Miller  
President  
ATIS

Amy Sander  
OBF Administrator

February 4, 2000

L. Charles Keller, Chief  
Network Services Division  
Common Carrier Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, D.C. 20554

FEB 24 2000

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

EX PARTE OR LATE FILED

CC DOCKET: 95-155

Dear Mr. Keller,

The purpose of this letter is to provide an updated status report on the work of the Ordering and Billing Forum's ("OBF") SMS Number Administration Committee ("SNAC") with respect to the implementation of the 866/855 Easily Recognized Codes ("ERCs") in support of Toll Free Service Applications.

In correspondence dated August 30, 1999, the SNAC had previously advised you that contingency planning had been completed (April 6, and 7, 1999) and an Allocation Plan had been agreed upon (Attachment I). The most recent Number Administration Report (Attachment II) indicates that the Allocation Plan will not need to be implemented prior to the 866/855 Network Ready Dates. It is important to note that the industry has just come through a slow period due to Holiday and Y2K implications and so recent utilization rates should be viewed as lower than usual. Notwithstanding, should the number situation change prior to the network implementation dates, the Allocation Plan stands ready. If the Allocation Plan is effected, the SNAC would also request that the FCC place a moratorium precluding New Resp Orgs from reserving numbers until the Allocation Plan is lifted.

The SNAC previously reported that we had formally agreed at OBF 66 to accept the delivery date for 866 on April 1, 2000 and 855 on July 1, 2000 as requested by the United States Telephone Association (USTA) National Services Council. Since our report to you on August 30, 1999, the industry has worked collectively to improve the delivery dates that were previously reported. At OBF 68, Ellen Oteo of the Service Management Team (SMT) reported that the USTA had reported that all companies could now support a dual code opening in the April 1, 2000 timeframe. The OBF SNAC moved the date for the 855 ERC to April 8, 2000 instead of July 1, 2000. The delivery date for 866 has not changed, it is the same date as was previously reported, April 1, 1999.

As public awareness of the new ERCs increases, the industry will be working to establish service requests in advance of the opening of the codes. Due to public interest in new codes as well as the potential for exhaust, it is anticipated that there will be pent up demand on the dates of the code openings. In anticipation of these needs, the SNAC is again requesting that the FCC issue an order to DSMI (Data Base Service Management, Inc.) that extends the reservation period on an interim basis (as was previously ordered for 877 implementation) from 45 to 60 days for those numbers reserved from April 1, 2000 through June 8, 2000. This will allow Resp Orgs and their customers time to ensure that there is adequate time to activate these numbers and would also reduce impacts to the SMS/800 and the SCP owner/operators during these crucial timeframes. We would ask that you reply with your support of this recommendation by February 14, 2000 in order that we can ensure that there is adequate time for making the system changes (within the SMS/800 as well as our various internal support systems) and also time for notifying and training our Sales Forces of the change.

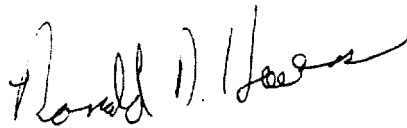
No. of Copies rec'd  
List ABOVE

2

The SNAC is holding monthly conference calls now to continue monitoring the status of number utilization in our industry. We stand ready to implement weekly calls if it becomes necessary. These calls are held the first Tuesday of each month at 12:00 PM ET. The Dial In Number is (712)271-3611 and the Pass Code is 3372. If it becomes evident on receipt of any weekly Number Administration Report that Contingency Planning is necessary, an emergency meeting would be established for the following Thursday. Again, as of this date, it appears that the leveling of Toll Free Resources fall within the utilization projections, negating the need (at least for the time being) for Contingency Planning.

We hope that this information is well received. We believe that the 866 and 855 Implementation Plans in coordination with the SNAC Contingency Plan address the needs of our industry. If you have any questions, please do not hesitate to call me at 913/624-6881 or Megan Campbell, ATIS General Counsel at (202)434-8847.

Sincerely,



Ron Havens  
OBF Moderator

Cc: Joan Saucedo, SNAC Co-Chair  
Matt Peacock, SNAC Co-Chair  
Megan Campbell, ATIS General Counsel  
Stephanie Cowart, OBF Assistant Moderator  
Les Selzer, FCC Economist  
Marty Schwimmer, FCC Senior Attorney