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Alliance for Telecommunications
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*Problem Solvers to the
Telecommunications Industry*

July 26, 2001



Standards Committee T1
Telecommunications



Carrier Liaison Committee



Telecommunications
Industry Forum



Network Interconnection
Interoperability Forum



Ordering and Billing Forum



Protection Engineers Group



Standards Committee O5



Network Reliability Steering
Committee



Network and Services
Integration Forum



Telecommunications Fraud
Prevention Committee



Industry Numbering Committee



Internetwork Interoperability
Test Coordination Committee



Generic Requirements
Users Group



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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

VIA HAND DELIVERY

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

Re: Changes to Toll-Free Number Administration System,
CC Docket No. 95-155

Dear Ms. Salas:

Enclosed is a copy of a letter to Ms. Dorothy Attwood, Chief, CCB, dated July 25, 2001, from Stephanie Cowart, Ordering and Billing Forum Moderator. Please place the letter in the record for CC Docket No. 95-155. Also, 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

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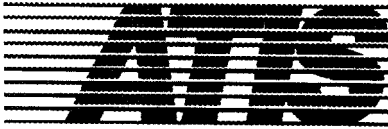
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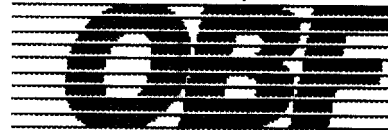
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A Forum of the Carrier Liaison Committee

1200 G Street NW
Suite 500
Washington DC 20005

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

Stephanie Cowart
Moderator

Martha Huizenga
Assistant Moderator

Susan Miller
President & CEO
ATIS

John Pautlitz
Director, Industry Forums
ATIS

Heike Martin
OBF Administrator
ATIS

July 25, 2001

Dorothy Attwood
Chief, Common Carrier Bureau
Federal Communications Commission
445 12th St., SW
Washington, D.C. 20554

Email: dattwood@fcc.gov

**Re: Changes to Toll-Free Number Administration System
CC Docket No. 95-155**

Dear Ms. Attwood:

On December 7, 2000, the Chief of the Network Services Division sent a letter to the President of DSMI ("Keller-Wade Letter," DA 00-2754) directing that certain changes be made to the Disconnect Status and Suspend Status functions of the SMS/800 database in order to address alleged problems with slamming and number brokering. On June 22, 2000, the Bureau released a Public Notice (DA 01-1463) seeking comments on a petition filed by AT&T seeking clarification of the FCC's toll-free regulations and other matters related to the *Keller-Wade Letter*. On July 13, 2001, the Commission issued a Public Notice (DA 01-1677) extending the deadline for complying with the *Keller-Wade Letter* "until the Bureau resolves the outstanding issues raised in the June Public Notice or until December 8, 2001, the industry-proposed deadline, whichever comes first."

When the Commission released its Public Notice on June 22, 2001, requesting comments from the industry, the SNAC and the SMT postponed actual work on design and development related activities. The industry strongly urges the Commission to undertake a thorough review of the Commission's Order modifying the SMS/800 Disconnect and Suspend Status functions. We also appeal to the Commission to adopt a well thought-out, pragmatic and workable approach concerning the transfer of toll-free numbers between subscribers, based on comments filed in response to the June Public Notice. Until the Commission has an opportunity to complete its review, it will be a wasteful expenditure of limited resources to proceed with undefined development and implementation of the changes mandated by the *Keller-Wade Letter*, and subsequent changes requested by the SNAC. Therefore, ATIS/SNAC requests that the Commission rescind the December 8, 2001 compliance date, and direct the industry to defer all implementation work pending a decision in CC Docket 95-155/NSD File No. L-01-112.

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If, based on the record in that proceeding, the Commission decides to go forward with the *Keller-Wade Letter*, a new compliance date of 6 to 8 months after the release of that order may be set.

The SNAC acknowledges that it did request deferral of the compliance date to December 8, 2001. However, this request was made prior to the release of the June Public Notice, and the requested December date required a finalized design by mid-June 2001. The finalized design date has now been postponed. As a result, the industry can no longer meet the December 8, 2001 date.


The SNAC looks forward to a final resolution from the Commission so that the industry can resume implementation activities.

A copy of this letter has been filed with the FCC for inclusion in Docket 95-155.

All questions and concerns regarding this correspondence should be addressed to the OBF SNAC Co-Leaders, Leslee Strohm at 720-540-1535 or via email: lstrohm@uswest.com, or Pat Parker at 972-615-8384 or via email: pat.parker@verizon.com.

Thank you for your attention to this matter.

Sincerely,



Stephanie Cowart
OBF Moderator

Cc: Martha Huizenga, OBF Assistant Moderator
Jeffrey Carlisle, Sr. Deputy Chief, CCB
Gregory Cooke, Assistant Chief, NSD, CCB
Diane Harmon, Acting Division Chief, NSD, CCB
Jennifer Gorny, Attorney, NSD, CCB
Les Selzer, Economist, NSD, CCB
Michael Wade, DSMI
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Deseree Herring, SNAC Administrator