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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY



Alliance for Telecommunications
Industry Solutions

Problem Solvers to the
Telecommunications Industry

July 9, 2001

ORIGINAL

VIA HAND DELIVERY

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

Re: Toll Free Service Access Codes, CC Docket No. 95-155

Dear Ms. Salas:

Enclosed is a copy of a letter to Ms. Dorothy Attwood, Chief, CCB, dated July 9, 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.

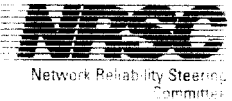
Please contact Megan Campbell, ATIS General Counsel at 202/434-8847 if you have any questions or comments.

Sincerely,

Megan L. Campbell
General Counsel

Enclosures

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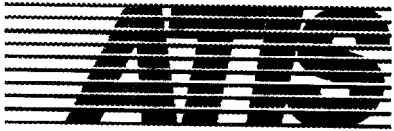
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A Forum of the Carrier Liaison Committee

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July 9, 2001

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

Email: dattwood@fcc.gov

Re: Toll Free Service Access Codes, CC Docket No. 95-155

Dear Ms. Attwood:

In the Fifth Report and Order in the above-referenced proceeding released almost a year ago (Summary of Report and Order, In the Matter of Toll Free Service Access Codes, Released July 5, 2000), the Commission "questioned whether the current SMS/800 system is the best available means of administering toll free numbers." The Commission requested that the NANC submit a recommendation "on how best to administer toll free numbers". Based on that recommendation, the commission stated that it would "move expeditiously to determine whether it is in the public interest to restructure the ownership and operation of the current system of toll free number administration, and, if so, whether a new toll free number administrator should be selected." Unfortunately, the NANC was unable to reach consensus and declined to submit a recommendation to the Commission on whether to subject administration of the centralized toll free database to a competitive bid process (November 29, 2000 correspondence from John R. Hoffman, NANC Chair, to Dorothy Attwood, Chief, Common Carrier Bureau, FCC).

The SMS/800 Number Administration Committee (SNAC) is the industry body tasked with, among other things, prioritizing new features and functions for future releases of the SMS/800. In light of the Commission's tentative conclusion in the Fifth Report and Order that administration of toll free numbers should be changed, the SNAC concluded that it would be ill advised to spend significant amounts of money to develop certain new SMS/800 features. Accordingly, the SNAC decided to recommend deferral of the implementation of those features. However, given the dramatic growth in the toll-free market, investment in enhanced features and functions cannot be deferred indefinitely. In evaluating the merits of future costly investments in the SMS/800, a critical factor which must be considered is the likelihood that this system will continue to serve as the industry's centralized administrative database, and for how long. Therefore, the SNAC seeks Commission guidance on its plans (if any) to initiate a proceeding to consider whether to replace the SMS/800 database system or to restructure its ownership and operation. Although the outcome of this proceeding obviously is unknown, even knowing the general timeframe which the Commission envisions it needs to resolve these issues will put the SNAC in a better position to make reasonable decisions on the timing and content of future SMS/800 releases.

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The SNAC would like to review this issue at the next OBF General Session, OBF #75, August 27-31, 2001 and is therefore requesting a response by August 20, 2001.

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

Thank you for your assistance in this matter.

Sincerely,



Stephanie Cowart
OBF Moderator

Cc: Martha Huizenga, OBF Assistant Moderator
Jeffrey Carlisle, Sr. Deputy Chief, CCB
Marty Schwimmer, Attorney, NSD, CCB
Jennifer Gorny, Attorney, NSD, CCB
Les Selzer, Economist, NSD, CCB
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