

North American Numbering Council
c/o Columbia Institute for Tele-Information
Columbia Business School
1A Uris Hall
3022 Broadway
New York, NY 10027-6902

May 27, 2004

Mr. William Maher
Chief, Wireline Competition Bureau
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

**Re: Recommendation for Abbreviated Dialing for One Call Notification
(CC Docket No. 92-105)**

Dear Mr. Maher:

The purpose of this letter is to clarify the December 4, 2003 recommendation of the North American Numbering Council (NANC) concerning compliance with a statute (the Pipeline Safety Act) that requires the establishment of a toll free, nationwide, three-digit telephone number for One-Call notification systems. NANC's recommendation is the basis for the Commission's May 14, 2004 Notice of Proposed Rule Making (Docket 92-105).

Specifically, NANC wishes to make it clear that the quickest, least expensive and most effective way to provide nationwide, toll-free access to One-Call centers would be through a nationwide ten-digit mnemonic toll-free telephone number. However, because the Pipeline Safety Act specifies a three-digit toll-free telephone number, this best solution would not comply with the statute.

In retrospect, there might be some confusion about NANC's December 4, 2003 recommendation. Therefore, at its May 18, 2004 meeting NANC members reiterated that the best solution would be for Congress to amend the Pipeline Safety Act to require a ten-digit number in lieu of the currently specified three-digit number. NANC's "recommended solution" of utilizing 811 is a distant "second best" solution necessitated by the specificity of the statute. NANC therefore recommends that the Congress should amend the statute so that its laudable statutory goal can be achieved quickly, inexpensively and without unnecessarily using scarce numbering resources.

Please contact me if you have any questions about NANC's recommendation, as clarified in this letter.

Sincerely,

/Signed/

Robert C. Atkinson
NANC Chair

cc: NANC Members
Carol Matthey – FCC
Eric Einhorn – FCC
Cheryl Callahan – FCC
Sanford Williams – FCC
Deborah Blue – FCC