

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

August 3, 2005

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

RE: VoIP Provider's Access to NANP Numbering Resources

Dear Mr. Navin:

On February 1, 2005, the FCC granted a waiver sought by SBC Internet Services, Inc. (SBCIS), formerly known as SBC IP Communications, Inc. (SBCIP), an information service provider affiliate of SBC Communications, Inc.. The waiver allows SBCIP (and similarly situated providers of VoIP services) to obtain numbering resources directly from the North American Numbering Plan Administrator (NANPA) and Pooling Administrator (PA). The Commission's waiver order also asked the North American Numbering Council (NANC) to determine what changes in the numbering rules would be required to make numbering resources generally available to IP-enabled service providers.

NANC's Future of Numbering Working Group (FoN WG) conducted an extensive and exhaustive analysis in response to the Commission's request and presented its report and recommendations at NANC's July 19 meeting. The FoN WG's report is attached to this letter. NANC fully endorsed and adopted the FoN WG's report and recommendations.

NANC specifically endorsed the underlying principle that North American Number Plan telephone numbers should be available to all service providers, including VoIP providers connecting to the PSTN, as long as that such numbers can be reached when called from the Public Switched Telephone Network. Therefore the FoN recommendation adopted by NANC is that NANP resources should be directly assigned to service providers whose intent is to ensure that calls from the Public Switched Telephone Network (PSTN) will or can be completed to the telephone numbers assigned the service provider's customers and end-users. The recommendations contained within the attached report will require existing numbering application forms to be modified, the alteration of some current number assignment criteria, and the adoption of the principle that all providers should share and bear the same "numbering-related" responsibilities.

On behalf of NANC, I urge the Commission to take whatever action is required to implement the recommendations contained in the attached report.

I would like to draw your attention to the significant effort expended by the FoN WG in conducting the review and making its recommendations. Specifically, a co-chair of the Working Group has estimated that 475-500 person-hours were devoted to conference calls and meetings. I would expect that double that number of hours were consumed in preparing for those meetings and conference calls, preparing and reviewing contributions and the final report.

Finally, by copy of this letter, I am forwarding the FoN WG's report to Ken Havens, Co-Chair of ATIS' Industry Numbering Committee (INC) so that ATIS can, upon your approval, make the necessary changes to the appropriate INC document and other ATIS documents impacted by the FoN WG's report.

Please let me know if you or your staff requires further information or would like to discuss any aspect of the report or NANC's decision.

Sincerely,

/Signed/

Robert C. Atkinson
NANC Chair

cc: Narda Jones, FCC
Cheryl Callahan, FCC
Regina Brown, FCC
Marilyn Jones, FCC
Sanford Williams, FCC
NANC Members
Ken Havens, INC co-chair
Adam Newman, INC co-chair
Jean Paul Emard, ATIS