

North American Numbering Council

c/o Phoenix Center for Advanced Legal and Economic Public Policy Studies
5335 Wisconsin Ave., N.W., Suite 440
Washington, DC 20015-2034

April 25, 2007

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

RE: NANC Recommendation for Permanent pANI Administration

Dear Mr. Navin:

On September 8, 2006, the Bureau requested that the North American Numbering Council ("NANC") recommend to the Bureau a permanent solution to pseudo Automatic Number Identification ("pANI" or "p-ANI") administration.¹ I am pleased to report to you that at our April 17, 2007 meeting, the NANC adopted the following recommendation for permanent pANI administration for the Bureau's consideration. The North American Numbering Council ("NANC") recommends to the Bureau consideration of a permanent solution to pseudo Automatic Number Identification ("pANI") administration.

The recommendation consists of two documents:

- NANC Recommendations for Permanent pANI Administration, prepared by the NANC pANI IMG and approved by the full NANC on November 30, 2006, and
- p-ANI Administration Guidelines (ATIS-0300098), prepared by ATIS and reviewed and approved by the NANC on April 17, 2007.

As I stated to you in my letter of October 10, 2006,² the attached recommendation does not include development of the specific technical requirements for pANI

1 Letter from Thomas J. Navin, Chief, Wireline Competition Bureau, Federal Communications Commission, to Thomas M. Koutsky, Chair, North American Numbering Council, and Amy L. Putman, Director, Number Pooling Services, NeuStar, Inc. (Sept. 8, 2006).

2 Letter from Thomas M. Koutsky, Chair, North American Numbering Council, to Thomas J. Navin, Chief, Wireline Competition Bureau, Federal Communications Commission (Nov. 10, 2006).

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administration that would be needed after the Bureau or the Commission decides upon a specific course of action.

The recommendation is a consensus position and many individuals devoted substantial time and energy toward their development. Upon receipt of your September 8, 2006 letter, I created a pANI Issue Management Group and appointed four co-chairs: Don Gray of the Nebraska Public Service Commission, Natalie McNamer of T-Mobile, Martin Hakimdin of Vonage, and Bill Shaughnessy of BellSouth (now AT&T). Numerous others volunteered their time to work on this issue in the IMG. In addition, the Industry Numbering Committee of the Alliance for Telecommunications Industry Solutions worked under the direction of the NANC to develop guidelines for pANI administration and I am greatly appreciative of their efforts in preparing the Administration Guidelines quickly and comprehensively.

The NANC stands ready to answer any questions you might have on this recommendation and to assist the Bureau in any other aspect of this matter.

Sincerely,



Thomas M. Koutsky
Chair, North American Numbering Council

Attachments:

NANC Recommendations for Permanent pANI Administration
p-ANI Administration Guidelines (ATIS-0300098) (with attachments)

cc: Julie Veach, FCC
Marcus Maher, FCC
Christi Shewman, FCC
Ann Stevens, FCC
Marilyn Jones, FCC
Marcus
Kenneth Havins, Chair, ATIS Industry Numbering Committee
Jean-Paul Emard, ATIS
NANC and pANI IMG Members