

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

January 5, 2006

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

RE: Contract for Permanent pANI Administrator

Dear Mr. Navin:

As you know, the North American Numbering Council (NANC) has established an Issues Management Group (IMG) to develop recommendations to facilitate implementation of the Commission's requirement that VoIP service providers provide enhanced 911 (E911) service. On September 6, 2005 I forwarded to you the IMG's initial recommendation which was that a "pseudo ANI" (pANI) should be utilized to accomplish the Commission's objective and that a neutral organization, similar to North American Numbering Plan Administrator (NANPA) or the Thousand Block Pooling Administrator (PA), would be needed to administer the pANIs. The September 6, 2005 letter also recommended immediate appointment of the Pooling Administrator as the *interim* pANI Administrator.

The purpose of this letter is to advise you that at its November 30, 2005 meeting the NANC adopted additional recommendations from the IMG concerning the procurement of *permanent* pANI administration in the FCC's next number administration procurement, presumably for a new Pooling Administrator contract since the current PA contract expires in June 2006.

At the November 30, 2005 NANC meeting, the IMG provided the following recommendation concerning the permanent pANI Administrator:

1. pANI administration should be managed under a federal (i.e., FCC) procurement similar to procurements which led to the current NANPA and PA contracts;

2. pANI administrator responsibilities should be included in the FCC's next Number Administration procurement so that a permanent administrator can be selected as quickly as possible. (The basis of this recommendation is that industry participants in the IMG believe that the level of work involved in pANI administration doesn't require a third administrator and that it would therefore be much less costly to add the pANI function to an existing administrator's responsibilities.)
3. the pANI administrator responsibilities should be discharged by the entity selected to be the Pooling Administrator. (The basis of this recommendation is that the assignment of pANIs is functionally more like number pooling than number administration.)

I have attached to this letter REVISED Interim pANI Guidelines for Emergency Services Query Keys (ESQKs). These update the guidelines forwarded to the Commission in September. They contain the administrative responsibilities that should be identified in the next procurement's Technical Requirements, with the exception that the permanent guidelines will include the assignment of all pANI Query Keys that may be used by any carrier. The IMG is available if additional assistance is needed to develop the Technical requirements.

Also, the IMG, in its work on the permanent recommendation, is developing further policy proposals that may drive the need for additional requirements for the administration of the pANIs that the Commission may want to include in its Request for Proposals. These additional recommendations will be forwarded to the Commission by the NANC once they have been completed.

Please let me know if you or your staff has any questions about this recommendation.

Sincerely,

/Signed/

Robert C. Atkinson
NANC Chair

Attachment

cc: Narda Jones, FCC
Cheryl Callahan, FCC
Marilyn Jones, FCC
James Bachtel, FCC
Sanford Williams, FCC
Dennis Dorsey, FCC
NANC Members